

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE)	
)	
ALEXANDER E. JONES)	CASE No. 22-33553
)	
DEBTOR.)	(CHAPTER 11)
)	
)	JUDGE CHRISTOPHER M. LOPEZ

**SUMMARY COVER SHEET TO THE SECOND INTERIM APPLICATION OF
JORDAN & ORTIZ, P.C. FOR ALLOWANCE AND PAYMENT OF COMPENSATION
AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD FROM
MAY 16, 2023 TO NOVEMBER 30, 2023**

Name of Applicant:	Jordan & Ortiz, P.C. ("J&O")	
Applicant's Role In Case:	Co-Counsel to Debtor	
Indicate Whether This Is an Interim or Final Application:	Second Interim	
Date Order of Appointment Signed:	January 20, 2023 (Dkt #105)	
	Beginning of Period	End of Period
Time Period Covered in this Application for Which Interim Compensation Has Not Previously Been Awarded:	May 16, 2023	November 30, 2023
Total Period Covered by Any Prior Applications:	January 1, 2023	May 15, 2023
Total Amounts Awarded in All Prior Applications (Dkt #346):	\$243,622.50 (fees) \$1,067.59 (expenses)	
Total Fees Requested in this Application:	\$61,455.00	
Total Professional Fees Requested in This Application:	\$57,780.00	
Total Professional Hours Covered by This Application:	96.30	
Average Hourly Rate for Professionals:	\$600.00	
Total Paraprofessional Fees Requested in This Application:	\$3,675.00	
Total Paraprofessional Hours Covered by This Application:	14.70	
Average Hourly Rate for Paraprofessionals:	\$250.00	
Reimbursable Expenses Sought in This Application:	\$316.99	
Total Fees and Expenses Requested in this Application:	\$61,771.99	

Were there serves provided necessary to the administration of or beneficial at the time rendered toward the completion of the case? Yes
Were the services performed in a reasonable amount of time commensurate with the complexity, importance and nature of the issues addressed? Yes
Is the requested compensation based on customary compensation charged by comparable skilled practitioners in other non-bankruptcy cases? Yes
Do expense reimbursements represent actual and necessary expenses incurred? Yes
Plan Status: Debtor has only recently filed a chapter 11 plan of reorganization. The deadline to file such plan was Friday, December 15, 2023, and the Plan was timely filed [Dkt #523].
Primary Benefits: During the Fee Period, led by co-counsel, the Debtor negotiated with the Texas Plaintiffs and with Connecticut Plaintiffs, worked on his personal budget and sources of income, and prepared and filed his Chapter 11 Plan.

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**SECOND INTERIM APPLICATION OF JORDAN & ORTIZ, P.C. FOR ALLOWANCE
AND PAYMENT OF COMPENSATION AND REIMBURSEMENT OF EXPENSES
INCURRED FOR THE PERIOD FROM MAY 16, 2023 TO NOVEMBER 30, 2023**

This motion seeks an order that may adversely affect you. If you oppose the motion, you should immediately contact the moving party to resolve the dispute. If you and the moving party cannot agree, you must file a response and send a copy to the moving party. You must file and serve your response within 21 days of the date this was served on you. Your response must state why the motion should not be granted. If you do not file a timely response, the relief may be granted without further notice to you. If you oppose the motion and have not reached an agreement, you must attend the hearing. Unless the parties agree otherwise, the court may consider evidence at the hearing and may decide the motion at the hearing.

Represented parties should act through their attorney.

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE CHRISTOPHER LOPEZ:

COMES NOW Jordan & Ortiz, P.C. (the “Applicant”) hereby submits its Second Interim Application for Allowance and Payment of Compensation and Reimbursement of Expenses for the Period from May 16, 2023 through November 30, 2023 (the “Application”) for second interim allowance of (a) compensation in the amount of \$61,455.00 for professional services Applicant rendered to the Debtor from May 16, 2023 through November 30, 2023 (the “Fee Period”) and (b) reimbursement of actual and necessary expenses in the amount of \$316.99 that Applicant incurred during the Fee Period.

ITEMIZATION OF SERVICES RENDERED AND EXPENSES INCURRED

1. In support of this Application, J&O attaches the following exhibits:

Exhibit A – Fifth Monthly Fee Statement of Jordan & Ortiz, P.C. for Allowance of Compensation for Services Rendered as Co-Counsel to the Debtor for the Period from May 16, 2023 through June 30, 2023 [Docket #375]

Exhibit B – Corrected Sixth Monthly Fee Statement of Jordan & Ortiz, P.C. for Allowance of Compensation for Services Rendered as Co-Counsel to the Debtor for the Period from July 1, 2023 through July 31, 2023 [Docket #443]

Exhibit C – Seventh Monthly Fee Statement of Jordan & Ortiz, P.C. for Allowance of Compensation for Services Rendered as Co-Counsel to the Debtor for the Period from August 1, 2023 through August 30, 2023 [Docket #444]

Exhibit D – Eighth Monthly Fee Statement of Jordan & Ortiz, P.C. for Allowance of Compensation for Services Rendered as Co-Counsel to the Debtor for the Period from September 1, 2023 through September 30, 2023 [Docket #459]

Exhibit E – Ninth Monthly Fee Statement of Jordan & Ortiz, P.C. for Allowance of Compensation for Services Rendered as Co-Counsel to the Debtor for the Period from October 1, 2023 through October 31, 2023 [Docket #476]

Exhibit F – Tenth Monthly Fee Statement of Jordan & Ortiz, P.C. for Allowance of Compensation for Services Rendered as Co-Counsel to the Debtor for the Period from November 1, 2023 through November 30, 2023 [Docket #520]

JURISDICTION AND VENUE

2. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the Standing Order of Reference from the United States District Court for the Southern District of Texas. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory predicate for the relief sought herein is 11 U.S.C. §§ 330 and 331, Federal Rule of Bankruptcy Procedure 2016(a), and the Local Rules of this Court.

RETENTION OF APPLICANT AND PRIOR COMPENSATION BACKGROUND

4. On December 2, 2022 (the “Petition Date”), Alexander E. Jones (the “Debtor”) filed with this Court a voluntary petition for relief under Chapter 11 of the Bankruptcy Code.

5. On December 21, 2022, the Debtor filed its Application for Entry of Order Authorizing the Retention and Employment of Jordan & Ortiz, P.C. as Debtor Co-Counsel Effective as of the Petition Date [Docket #71]. On January 20, 2023, the Court entered the Retention Order of J&O as Bankruptcy Co-Counsel for the Debtor [Docket #105].

6. On January 20, 2023, the Court entered its Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106] (“Interim Compensation Order”) permitting Applicant to receive payment of 80% of fees and 100% of expenses. Pursuant to the Interim Compensation Order [Docket #346], Applicant has received periodic payments on fees still owed under the First Interim Order as set forth below:

<u>Invoice No.</u>	<u>Month Billed</u>	<u>Invoice Date</u>	<u>Fees</u>	<u>Expenses</u>	<u>Invoice Total</u>	<u>Amount Applied</u>	<u>Interim Amount Applied Per #346</u>	<u>Remaining Balance Due</u>
First Fee Application								
922199	December	1/27/23	\$77,362.50	\$506.65	\$77,869.15	-\$62,396.65	\$15,472.50	\$0.00
922213	January	2/15/23	\$28,125.00	\$102.50	\$28,227.50	-\$22,602.50	\$5,625.00	\$0.00
922268	February	3/2/23	\$51,205.00	\$22.44	\$51,227.44	-\$40,986.44	\$10,241.00	\$0.00
922376	March	4/6/23	\$46,820.00	\$120.30	\$46,940.30	-\$20,804.57	\$26,135.73	\$0.00
922405	April	5/4/23	\$15,560.00	\$0.00	\$15,560.00	\$0.00	\$2,168.44	\$13,391.56
922449	May 1-15	5/18/23	\$24,550.00	\$315.70	\$24,865.70	\$0.00		\$24,865.70
		TOTALS	\$243,622.50	\$1,067.59	\$244,690.09	-\$146,790.16	\$59,642.67	\$38,257.26

7. On May 29, 2023, Applicant filed its First Interim Application for Compensation for the period of December 1, 2022 to May 15, 2023 [Docket #306]. The Court entered its Order on June 23, 2023 Granting Applicant’s First Interim Fee Application for a total of \$243,622.50 for fees and \$1,067.59 for expenses [Docket #346] (the “First Interim Order”).

8. Pursuant to the First Interim Order Applicant has received payment of \$50,668.32 which has been applied to the oldest invoices due from the First Interim Application.

9. This is Applicant's Second Interim Application. This Application includes fees and expenses incurred during the entire period of Applicant's engagement from May 16, 2023 through November 30, 2023.

10. These services were rendered, and expenses incurred during Applicant's representation of the Debtor in this case. Applicant believes such fees and expenses were reasonable, necessary, and appropriate, given the circumstances.

NATURE AND EXTEND OF LEGAL SERVICES PROVIDED

11. Applicant has provided extensive legal services to the Debtor during the six (6) months comprising the Interim Period. Attached to this Application as Exhibits "A-F" are records of the time keeping entries during the Interim Period generated by Applicant's personnel who have worked on this engagement (the "Invoice"). These entries provide detailed descriptions of Applicant's services on the Debtor's behalf during the Interim Period.

12. The Invoices also specify each attorney who provided compensable services during the Interim Period. Specifically, the Invoices identify the person providing the service, as well as the following: (1) that person's individual billing rate and (2) the total number of hours expended by that person.

13. Applicant has broken down its legal services rendered according to the project categories propounded by the Guidelines of the Office of the United States Trustee. The pertinent project categories are:

- Case Administration
- Asset Analysis and Recovery
- Asset Disposition
- Relief from Stay/Adequate Protection Proceedings
- Meetings of and Communications with Creditors
- Fee/Employment Applications
- Fee/Employment Objections
- Avoidance Action Analysis

- Assumption/Rejection of Leases and Contracts
- Other Contested Matters (excluding assumption/rejection motions_
- Business Operations
- Employee Benefits/Pensions
- Financing/Cash Collections
- Tax Issues
- Real Estate
- Board of Directors Matters
- Claims Administration and Objections
- Plan and Disclosure Statement (including Business Plan)
- General Bankruptcy Advice/Opinions
- Restructurings

14. The figures for the time and amounts billed per project category cover the Interim Period. The following chart generally describes the services rendered by Applicant to the Debtor in each of the relevant project categories, with more additional detail provided by in Exhibits “A-F”:

FEES INCURRED IN INTERIM PERIOD		
CATEGORIES	HOURS	FEES
B110 Case Administration	37.90	\$22,740.00
B120 Asset Analysis and Recovery	0.80	\$480.00
B130 Asset Disposition	0.30	\$180.00
B140 Relief from Stay/Adequate Protection		
B150 Meetings of & Communications with Creditors		
B160 Fee/Employment Applications	11.30	\$3,455.00
B170 Fee/Employment Objections	1.00	\$600.00
B180 Avoidance Action Analysis		
B185 Assumption/Rejection of Executory Contracts		
B190 Other Contested Matters	49.70	\$28,000.00
B195 Non-Working Travel		
B210 Business Operations	2.90	\$1,740.00
B220 Employee Benefits/Pensions		
B230 Financing/Cash Collections		
B240 Tax Issues		
B250 Real Estate		
B260 Board of Directors Matters		
B310 Claims Administration and Objections	3.30	\$1,980.00

B320 Plan and Disclosure Statement	0.90	\$540.00
B410 General Bankruptcy Advice/Opinions	2.90	\$1,740.00
B420 Restructurings		
TOTALS:	111.00	\$61,455.00

REQUEST FOR REIMBURSEMENT OF EXPENSES INCURRED

15. While providing legal services to the Debtor, Applicant incurred certain reasonable and necessary out-of-pocket expenses while representing the Debtor. A detailed record of these expenses is included in the Invoice. Expenses were billed at actual cost. Applicant does not charge for long distance telephone, outgoing faxes, and in-house charges for copying and postage. Outside copies and postage are billed the rate by the vendor. Applicant has made no request for general overhead expenses.

16. Applicant's post-petition expenses are separated into relevant categories as set forth in the table below, with additional detail set forth in Exhibits "A-F".

EXPENSE	AMOUNT
Court Fees	\$300.00
Research	\$16.99
TOTAL	\$316.99

17. Applicant believes that expense request is reasonable, appropriate, and necessary and requests that the Court grant it reimbursement for \$316.99 in reimbursable expenses incurred during the Interim Period by Applicant on the Debtor's behalf.

FACTORS AFFECTING COMPENSATION

18. Courts recognize that factors other than the number of hours spent and the hourly rate normally charged may be considered in fixing the amount of reasonable attorneys' fees to be awarded in a bankruptcy proceeding. Such factors are set forth in, *In re First Colonial Corporation of America*, 544 F.2d 1291 (5th Cir. 1977) and *Johnson v. Georgia Highway Express, Inc.*, 488

F.2d 714 (5th Cir. 1974). One or more of these Johnson factors may serve as a basis for enhancing the hourly rate which might otherwise be allowed. *Wolf v. Frank*, 555 F.2d 1213 (5th Cir. 1987). The Johnson factors are discussed in further detail below.

A. Time and Labor Required. Exhibits “A-F” lists in detail all the work performed for which compensation is sought. Time entries are broken out by project categories. The date the services were rendered, the individual performing such services, a description of the services, and the time expended are all detailed. Applicant believes that such detail establishes that its request for compensation is reasonable. All the services specified were actual and necessary for the Debtor to perform its statutory duties.

B. Novelty and Difficulty. As set forth in greater detail in Exhibits “A-F”, this case has involved a number of challenging legal and operational issues. The pending Sandy Hook Litigation presented unique issues and hurdles to overcome to preserve the Debtor’s operations and develop a path towards reorganization. Applicant has faced a faced several difficult and complex legal issues, including:

- Continue furnishing documents and past strategy issues and problems to aid co-counsel;
- Work on pre-petition summary of all fees paid by Debtor regarding affiliate Chapter 11 case and participation advice;
- Advising Debtor regarding issues of financial transactions disclosures; issues of historical statements to be corrected as misstatements of counsel for Sandy Hook Plaintiffs and dealing with contributions of debtor to FSS to offset sharing of legal fees and enforcement of the statutory and contractual indemnification of defense costs for employment related litigation (primarily Sandy Hook Plaintiffs);
- Work on issues of appeals of Sandy Hook Plaintiffs cases and advice and discuss issues of Texas Plaintiffs proposals, case authorities, and related arguments.
- Advising the Debtor with respect to the Tort Committee Motion in FSS to revoke the Subchapter V chapter 11 election and the uncertainty of issues surrounding Subchapter V of chapter 11 and impact on Debtor’s case and the various 2004

- notices for document examination and debtor examination and advice regarding the Sub Chapter V Trustee's report and need for clarification of supplemental matters;
- Work on appeals of Court's summary judgment orders and basis for issues raised in drafts of Judge Isgur's mediation statement (not used), including issues of misplaced burden of proof, use of "estimation process to determine plan claims;
 - Work on issues of salary reduction and issues of employment agreement to deal with the allowance of indemnification provided therein, outside work as allowed therein, and provisions for exemption of salary to annuities; review and comment on proposed employment agreement and indemnification;
 - Work on presentation to bankruptcy court regarding prior mis-statements, including allegation of \$50M+ in draws from 2020 or 2018 and prepare finished version of chart illustration salary of approximately \$2.0M to \$2.2M from fiscal 2014 to 2022; chart showing contributions by Debtor to FSS in 2022 of approximately \$10M to support the continued ability of FSS to operate, including debtors use of a majority of \$3.2M in homestead sale proceeds contributed to FSS and use of \$8M in Bitcoin contributions to debtors Bitcoin wallet paid over to FSS, in addition to financing of consigned Platinum products to allow FSS sales to continue and contributions and advance to FSS initially to ship large backlog of paid for shipments as a result of FSS CRO understatement in his original budget for re-ordering and shipping of products; and
 - Work with Debtor in dealings with third parties and issues including ESG and Midmountain issues, including work on documents and evidence of full and timely disclosures of activities or potential activities and related issues.

C. Skill Required to Perform the Legal Services Properly. Bankruptcy is a specialized area of federal practice, requiring knowledge of the Bankruptcy Code and other related state and federal statutes and precedent. It also requires a working knowledge of a number of other areas of complicated legal issues, many of which were on an expedited basis and required a substantial amount of skill. The Court is familiar with the extensive emergency hearings, from the first-day motions to the motions to approve and modify the use of FSS cash collateral to the motions for relief from stay and various other motions.

D. Customary Fee. The hourly rates for each professional are summarized above and in Exhibits "A-F" filed in support of this Application. The rates for bankruptcy attorneys reflect the usual rates charged by the Applicant. The hourly rates requested by Applicant compare

favorably with average costs for similar legal services provided by law firms representing debtors in chapter 11 cases involving the level of sophistication required in this case. Importantly, Applicant's rates are significantly lower than the rates charged by other professionals who have appeared in this case.

E. Whether the Fee is Fixed or Contingent. Applicant's fee is neither fixed nor contingent, other than the contingency of court-allowance and potential for lack of available assets to pay professionals. It is based upon the actual total number of hours worked plus the actual costs incurred.

F. Amount Involved and Results Obtained. Exhibits "A-F" details Applicant's work during the Interim Period. The dates such services were rendered, the individual performing such services, descriptions of the services and the time expended are all detailed. Applicant believes that such information establishes that its requested compensation is reasonable.

G. Experience, Reputation, and Ability of the Attorneys. Mr. Jordan has regularly appeared in significant representations over many years, including bankruptcy cases throughout Texas and the United States and has confirmed plans reorganizing over \$6 billion in claims. Mr. Jordan has fifty years of experience focusing on bankruptcy matters and has a positive reputation in the business and legal community. He is Board Certified in Business Bankruptcy Law by both the State of Texas and the American Bankruptcy Institute, from the first year each respective board certification was offered to Texas counsel. He is recognized among the best lawyers in Texas by Best Lawyers every year since 1990, AV rated every year since 1978 and by Texas Monthly "Super Lawyer" in business bankruptcy for each year published beginning in 2003.

H. "Undesirability" of Case. Representation of the Debtor in this chapter 11 case was undesirable. The Debtor's is a nationally known, and controversial figure and the subject of

public ire, including frequent threats to his and his family safety. Further, given the contentious nature of the Sandy Hook Litigation both by lawyers and the courts and the treatment of the underlying claims, even matters that should be easily agreed are fiercely contested and finally, the potential lack of funding has caused a decision to reduce counsel's participation in the Chapter 11 case to an "as needed" consultant determined by co-counsel.

I. Awards in Similar Cases. Based on Applicant's experience in the Texas legal market and throughout the country, Applicant's fees are lower than the fees allowed to similarly qualified counsel in proceedings of similar scope for the services rendered and results obtained.

RESULTS OBTAINED

19. Applicant offers the following synopsis of its significant efforts on behalf of the Debtor to date:

a. **Case Administration** – Applicant aided, from time to time, co-counsel and the FAs in building the base of information and guiding the Debtor through the administrative aspects of a bankruptcy case. The work toward a potential resolution of the Sandy Hook Judgment Claims and the work to assist the appellate lawyers in understanding the bankruptcy court's claims objection process, claims estimation process, the impact of discovery default judgments and the application by the trial courts, rulings permitting, for example, double hearsay as well as testimony by experts testifying to a jury that the Debtors' combined net worth exceeded \$250,000,000, and the resulting actual and punitive damages resulting.

b. **Experience in Fee/Employment Applications and Objections.** Applicant has prosecuted in bankruptcy cases applications to employ multiple special counsel necessary to defense of state court lawsuits and to prosecute appeals of the resulting judgments, many of those applications were contested. In addition to applications to retain professionals for

the Debtor, numerous applications have been filed for the retention of professionals including in the related FSS bankruptcy case.

c. **Assumption and Rejection of Leases and Contract** – Applicant has filed and prosecuted multiple motions to reject certain contracts and leases and, in this case, reviewed and commented on the several rejection motions for relationships or services no longer necessary to the Debtor's operations, primarily ESG. Applicant has also analyzed from time to time, with co-counsel, other contracts and leases and attended to termination under the terms of the contracts.

d. **Business Operations** – Applicant has assisted, when asked by co-counsel, the Debtor in evaluating existing and prospective business opportunities with counterparties regarding inventory purchasing, consignment sales to FSS, financing of product fulfillment at FSS, as well as issues of credit card processing, and salary reduction issues, among others.

e. **Financing** - during this term the Debtor has been advised regarding his monthly budget, his salary, and the expectation of salary increases.

f. **Litigation** – The services provided by Applicant to the Debtor related to the mediation and appeals of the Sandy Hook Litigation, the effort to settle the Sandy Hook Judgment and determine the claims analysis for both settlement purposes, and if unsuccessful, for appeals of the orders related to the Sandy Hook Motion for Summary Judgment claims, the appeal positions taken by the co-counsel appellate lawyers as relates to the bankruptcy claims objections and dischargeability, and exchange of advice toward defeating the claims of any collateral estoppel of the Sandy Hook judgments to allow determination in the bankruptcy court or estimation as the case may be.

g. **Meetings and Communications with Creditors** – Applicant has not been involved in any direct communications with counsel for the Sandy Hook Texas and Connecticut Plaintiffs but when consulted advised regarding appeals, settlement, plan terms and the like.

h. **Plan**–The Plan has now been finalized and filed and review of the Plan by Applicant was requested by co-counsel.

20. Other bankruptcy practitioners involved in cases of comparable size and complexity regularly charge hourly rates ranging from \$675.00 to over \$800 per hour. Applicant's approved hourly rate at \$600 in this case is meaningfully lower than the lowest rate in that range. Based upon the services described and the results obtained, the fees requested in this Application are fair and reasonable.

CONCLUSION

21. Pursuant to this Interim Application, Applicant seeks approval on an interim basis of (i) compensation of fees in the total sum of \$61,455.00 and (ii) reimbursement of expenses in the total sum of \$316.99. Applicant requests interim approval and payment of all approved, accrued, and unpaid fees and expenses for the Interim Period.

PRAYER

22. WHEREFORE, Applicant respectfully prays that the Court enter an order (i) approving this Interim Application; (ii) allowing, on an interim basis, the reasonable attorney fees and expenses claimed herein as allowed administrative expenses of the Debtor's estate; (iii) authorizing and directing the Debtor to promptly pay the remaining balance of approved amounts to Applicant; and (iv) granting such other and further relief to which Applicant is justly entitled.

Respectfully submitted December 19, 2023

/s/ Shelby A. Jordan

SHELBY A. JORDAN

State Bar No. 11016700

S.D. No. 2195

ANTONIO ORTIZ

State Bar No. 24074839

S.D. No. 1127322

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CO-COUNSEL FOR DEBTOR

CERTIFICATE OF SERVICE

I certify that on December 19, 2023, true and correct copy of the foregoing document was filed with the Court and served electronically upon those parties registered to receive electronic notice via the Court's CM/ECF system as follows.

Raymond William Battaglia on behalf of Creditor Free Speech Systems, LLC

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Marty L Brimmage on behalf of Creditor Carlee Soto Parisi, Carlos M Soto, Creditor Committee Official Committee Of Unsecured Creditors, Creditor Committee Official Committee of Unsecured Creditors of Alexander E. Jones, David Wheeler, Donna Soto, Francine Wheeler, Ian Hockley, Jacqueline Barden, Jennifer Hensel, Jillian Soto-Marino, Leonard Pozner, Marcel Fontaine, Mark Barden, Neil Heslin, Nicole Hockley, Robert Parker, Scarlett Lewis, Veronique De La Rosa, William Aldenberg and William Sherlach

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/s/ Shelby A. Jordan

Shelby A. Jordan

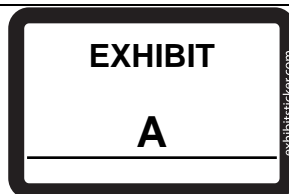
EXHIBIT “A-F”
FEE STATEMENTS

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE)	
)	
ALEXANDER E. JONES)	CASE No. 22-33553
)	
DEBTOR.)	(CHAPTER 11)
)	
)	JUDGE CHRISTOPHER M. LOPEZ

**FIFTH MONTHLY FEE STATEMENT OF JORDAN & ORTIZ, P.C. FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS
CO-COUNSEL TO THE DEBTOR FOR THE PERIOD FROM
MAY 16, 2023 THROUGH JUNE 30, 2023**

Name of Applicant:	Jordan & Ortiz, P.C. (“J&O”)	
Applicant’s Role in Case:	Co-Counsel to Debtor	
Date Order of Appointment Signed:	January 20, 2023 (Dkt #105)	
	Beginning of Period	End of Period
Time Period Covered in Statement:	05/16/2023 ¹	06/30/2023
Summary of Total Fees and Expenses Requested		
Total Fees Requested in this Statement:	\$15,476.00 (80% of \$19,345.00)	
Total Reimbursable Expenses Requested in this Statement:	\$203.39 ²	
Summary Attorney Fees for the Period Covered by this Statement		
Attorneys Fees in this Statement:	\$18,420.00	
Total Actual Attorneys Hours Covered by this Statement:	30.70	
Average Hourly Rate for Attorneys:	\$630.13	
Summary Paraprofessional Fees for the Period Covered by this Statement		
Paraprofessional Fees Requested in this Statement:	\$925.00	
Total Actual Paraprofessional Hours Covered by this Statement:	3.70	
Average Hourly Rate for Paraprofessionals:	\$250.00	



¹ May 1-15, 2023 time was included in the First Interim Application for fees and expenses from December 1, 2022 through May 15, 2023 (Docket #306) and Ordered to be paid (Docket #346).

² The date listed for expenses contained in the attached does not necessarily reflect the date on which the expense was actually incurred by Applicant.

In accordance with the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106], each party receiving notice of the monthly fee statement will have 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14 day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

RELIEF REQUESTED

1. This is Jordan & Ortiz, P.C.'s ("J&O") fourth monthly fee statement for compensation (the "Fee Statement") for the period of May 16, 2023 through June 30, 2023 (the "Fee Period") pursuant to the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106] (the "Interim Compensation Order"). J&O is filing its first amended monthly fee statement for compensation showing that J&O requests: (a) allowance of compensation in the amount of \$15,476.00 (80% of \$19,345.00) for actual, reasonable, and necessary professional services rendered to the Debtor by J&O and (b) reimbursement of actual, reasonable, and necessary costs and expenses in the amount of \$203.39 incurred by J&O during the Fee Period. By this Fee Statement, J&O seeks interim allowance of compensation for services rendered and reimbursement of expenses incurred solely in connection with its work performed on behalf of the Debtor.

SERVICES RENDERED AND DISBURSEMENTS INCURRED

2. Attached above as Exhibit "A" is the Fee Statement for the period May 16, 2023 through June 30, 2023, which includes a summary of professionals who rendered services to the Debtor during the Fee Period, including each person's billing rate and the fees incurred during the Fee Period summarized by task code and the itemized schedule of expenses within each category,

including description, incurred with the amounts for which reimbursement is requested. Exhibit “A” also shows the fee statements that were included in the First Interim Application for fees and expenses from December 1, 2022 through May 15, 2023 (Docket #306) and Ordered to be paid (Docket #346). Attached as Exhibit “B” is a Task Code breakdown by Attorney and Paralegal.

NOTICE AND OBJECTION PROCEDURES

3. Pursuant to the Interim Compensation Order notice of this Fee Statement has been provided to:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, dallaseservice@crowedunlevy.com)
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. All parties that receive ECF notifications

In light of the nature of the relief requested herein, J&O submits that no further or other notice is required.

4. Pursuant to the Interim Compensation Order (ECF #106), the Notice Parties and parties in interest have 14 days after service of the Monthly Fee Statement to object to the requested fees and expenses. If any Notice Party, or any other party in interest, objects to a Retained Professional's Monthly Fee Statement, it must serve on the affected Retained Professional and each of the other Notice Parties a written objection (the "Objection") so that it is received on or before the Objection Deadline. Thereafter, the objecting party and the affected Retained Professional may attempt to resolve the Objection on a consensual basis. If the parties are unable to reach a resolution of the Objection within 14 days after service of the Objection, or such later date as may be agreed upon by the objecting party and the affected Retained Professional, the affected Retained Professional may either: (i) file a response to the Objection with the Court, together with a request for payment of the difference, if any, between the Maximum Payment and the Authorized Payment made to the affected Retained Professional (the "Incremental Amount") and schedule such matter for hearing on at least 14 days' notice; or (ii) forego payment of the Incremental Amount until the next interim or final fee application hearing, at which time the Court will consider and dispose of the Objection if requested by the affected Retained Professional. Failure by a Notice Party, or any other party in interest, to object to a Monthly Fee Statement shall not constitute a waiver of any kind nor prejudice that party's right to object to any Interim Fee Application (as defined below) subsequently filed by a Retained Professional.

5. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. J&O reserves the right to make further application to this Court for allowance of such fees and expenses not included herein, or correct and erroneous or errors set out herein. Subsequent Monthly Fee Statements will be filed

in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

WHEREFORE, pursuant to the Interim Compensation Order, and pending the expiration of the objection deadline, if no objections to the Fee Statement are received, J&O respectfully requests: (a) that it be allowed on an interim basis (i) \$15,476.00 (80% of fees in the amount of \$19,345.00) for reasonable, actual and necessary services rendered by it on behalf of the Debtor during the Fee Period and (ii) reimbursement of \$203.39 for reasonable, actual and necessary expenses incurred during the Fee Period; (b) that the Debtor be authorized and directed to immediately pay to J&O the amount of \$15,679.39 which is equal to the sum of 80% of J&O's fees and 100% of J&O's expenses incurred during the Fee Period, and (c) and granting such other and further relief as the Court may deem just and proper.

Dated: July 19, 2023

/s/ Shelby A. Jordan
SHELBY A. JORDAN
State Bar No. 11016700
S.D. No. 2195
ANTONIO ORTIZ
State Bar No. 24074839
S.D. No. 1127322
Jordan & Ortiz, P.C.
500 North Shoreline Blvd., Suite 804
Corpus Christi, TX 78401
Telephone: (361) 884-5678
Facsimile: (361) 888-5555
Email: sjordan@jhwclaw.com
aortiz@jhwclaw.com
Copy to: cmadden@jhwclaw.com
CO-COUNSEL FOR DEBTOR

CERTIFICATE OF SERVICE

I certify that on July 19, 2023, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, dallaseservice@crowedunlevy.com)
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. All parties that receive ECF notifications

/s/ Shelby A. Jordan

Shelby A. Jordan

EXHIBIT “A”

**JORDAN & ORTIZ, P.C. MARCH INVOICE FOR PERIOD
MAY 16, 2023 through June 30, 2023**

**SUMMARY OF PREVIOUS INVOICES THAT HAVE BEEN ORDERED
TO BE PAID UNDER DOCKET #346**

<u>Invoice No.</u>	<u>Month Billed</u>	<u>Invoice Date</u>	<u>Fees</u>	<u>Expenses</u>	<u>Invoice Total</u>	<u>Amount Applied</u>	<u>Remaining Balance Due</u>
922199	December	1/27/23	\$77,362.50	\$506.65	\$77,869.15	-\$62,396.65	\$15,472.50
922213	January	2/15/23	\$28,125.00	\$102.50	\$28,227.50	-\$22,602.50	\$5,625.00
922268	February	3/2/23	\$51,205.00	\$22.44	\$51,227.44	-\$40,986.44	\$10,241.00
922376	March	4/6/23	\$46,820.00	\$120.30	\$46,940.30	-\$20,804.57	\$26,135.73
922405	April	5/4/23	\$15,560.00	\$0.00	\$15,560.00	\$0.00	\$15,560.00
922449	May 1-15	5/18/23	\$24,550.00	\$315.70	\$24,865.70	\$0.00	\$24,865.70
TOTAL				\$1,067.59	\$244,690.09	-\$146,790.16	\$97,899.93

JORDAN & ORTIZ, P.C.
 500 N. SHORELINE BLVD, SUITE 900
 CORPUS CHRISTI, TEXAS 78401-0341
 TAX ID NO. 74-2553880
 (361) 884-5678

JONES, ALEX
 alexejones1777@gmail.com

Page: 1
 June 08, 2023
 Account No: 5481-002000M
 Statement No: 922462

Bankruptcy

PREVIOUS BALANCE					\$97,899.93
					Hours
05/16/2023	SAJ	B110	A106	Call to debtor regarding meeting on Saturday.	0.20
	SAJ	B120	A107	Call and conference with Pattis on turnover of give-send-go fund to DIP account and wire instruction from co-counsel.	0.30
	SAJ	B190	A107	Follow up email to co-counsel again requesting a copy of the settlement agreement and status report of telephone conference with Isgur and settlement offer.	0.20
	SAJ	B190	A107	Call from Battaglia and email to Lemmon on settlement and PQPR (David and Carol) 2004 exam and Cicack 2004 exam.	0.40
05/19/2023	SAJ	B110	A106	Call with debtor.	1.00
	SAJ	B110	A109	Prepare and attend status conference with court and review timing of mediation offer and response.	0.70
	SAJ	B110	A107	Email and call from Pattis regarding appellate brief and discussions he had with debtor.	0.70
	SAJ	B110	A107	Email to co-counsel regarding items in status conference.	0.40
05/22/2023	SAJ	B110	A107	Telephone conference with Pattis and Battaglia regarding retention of fees due by FSS and Jones and work on documents needed.	0.70
	SAJ	B310	A103	Work on edits to Pattis appeal brief and telephone conference with Pattis.	2.00
05/24/2023	CRM	B160	A103	Revisions to first interim fee application and send to Shelby Jordan for approval.	2.20
05/26/2023	SAJ	B190	A104	Review relief from stay filed by De La Rosa and Posner.	0.40
	SAJ	B190	A106	Call and conference with debtor regarding June 14 hearing.	0.40

JONES, ALEX

June 08, 2023

Account No: 5481-002000M
Statement No: 922462

Bankruptcy

				Hours		
	SAJ	B190	A103	Final review and forward edits and conference with Pattis regarding edits done to prior appellate brief.	1.80	
05/29/2023	CRM	B160	A103	Final review and revisions to first interim fee application and proposed order and file and serve same.	1.50	
	SAJ	B190	A103	Work on final drafts edits to Norm Pattis appeal brief and record excerpts.	2.00	
05/30/2023	SAJ	B190	A103	Work on new final drafts edits to Norm Pattis appeal brief and record excerpts and telephone conference with Pattis.	2.30	
05/31/2023	SAJ	B110	A107	Call from Pattis regarding attorneys fees remaining and questions of FSS non-payment; email to co-counsel and call to Battaglia.	0.70	
	SAJ	B190	A107	Conference with Pattis regarding appeal brief and my expected edits and work on edits.	0.80	
				For Current Services Rendered	18.70	9,925.00

Recapitulation

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
SHELBY A. JORDAN	Partners	15.00	\$600.00	\$9,000.00
CHRYSTAL MADDEN	Paralegals	3.70	250.00	925.00

05/31/2023	B110	E106	Online Research - Lexis	16.99
05/31/2023	B110	E106	Online research - Pacer	172.10
			Total Expenses	189.09
			Total Current Work	10,114.09
			Balance Due	<u>\$108,014.02</u>

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	2640.00	189.09
B120	Asset Analysis and Recovery	180.00	0.00
B160	Fee/Employment Applications	925.00	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	4980.00	0.00
B100	Administration	8,725.00	189.09
B310	Claims Administration and Objections	1200.00	0.00
B300	Claims and Plan	1,200.00	0.00

The entry N/C signifies time spent for which there will be no charge.

JOSE DANIEL ORTIZ, ESQ.
 500 N. SHORELINE BLVD, SUITE 900
 CORPUS CHRISTI, TEXAS 78401-0341
 TAX ID NO. 74-2553880
 (361) 884-5678

JONES, ALEX
 alexejones1777@gmail.com

Page: 1
 July 11, 2023
 Account No: 5481-002000M
 Statement No: 922517

Bankruptcy

PREVIOUS BALANCE						\$108,014.02
					Hours	
06/02/2023	SAJ	B120	A104	Review ESG emergency motion to quash discovery and call to client.	0.30	
06/05/2023	SAJ	B110	A106	Call to client regarding current status of outstanding issues.	0.30	
	SAJ	B160	A107	Email and call to Battaglia regarding Connecticut appeal fee due Pattis.	0.30	
	SAJ	B190	A107	Conference with Pattis regarding appeal and appeal fees and status of additional California assistance by client/co-counsel.	0.30	
	SAJ	B190	A107	Email to co-counsel for first draft of response to MSJ.	0.30	
06/06/2023	SAJ	B110	A106	Call to client.	0.20	
	SAJ	B110	A107	Email to co-counsel regarding communications.	0.20	
	SAJ	B160	A107	Conference with Pattis regarding new counsel DH and review and call and message to Battaglia.	0.40	
	SAJ	B190	A107	Request draft copies of response to MSJ from co-counsel.	0.20	
06/08/2023	SAJ	B110	A104	Review docket for update in absence of communications from co-counsel.	0.40	n/c
06/09/2023	SAJ	B190	A103	Begin review of draft response to MSJ by Sandyhook Plaintiffs.	2.80	
06/10/2023	SAJ	B190	A104	Work on review and outline of CT and TX MSJ response and briefing.	1.30	
06/11/2023	SAJ	B190	A104	Continue review of draft of response to MSJ by Sandyhook Plaintiffs amended CT and TX briefing and make notes for appellate lawyers.	2.10	
06/12/2023	SAJ	B190	A104	Finish review of draft response to MSJ by Sandyhook plaintiffs amended CT and TX briefing and circulate copies and		

JONES, ALEX

July 11, 2023

Account No: 5481-002000M
Statement No: 922517

Bankruptcy

				Hours		
			comments to Pattis and Martin for important ideas and briefing in the appeals.	2.30		
06/13/2023	SAJ	B160	A107	Conference with Battaglia regarding Pattis application for appellate work and status of issues regarding mediation and counter-proposals from Sandy Hook plaintiffs. s	0.40	
	SAJ	B190	A107	Review and forward to Pattis and Martin filed copies of client's response to MSJ as appellate counsel for consideration in drafting appellate issues and arguments.	0.70	
06/14/2023	SAJ	B190	A109	Attend hearing on motion to lift stay tex other plaintiffs and emails to co-counsel regarding Court's response and questions.	0.80	
06/23/2023	SAJ	B170	A107	Circulate certificate of no objection to J&O fees and email to co-counsel and advisors and respond to reply regarding payment of 20% holdback and call to Battaglia.	1.00	
	SAJ	B190	A107	Email from Wholman of Randazo firm regarding bad faith claim and court ruling and forward to co-counsel.	0.40	
06/29/2023	SAJ	B110	A107	Multiple emails to co-counsel after attending hearings on cash collateral and 9019 settlement Pozner claims and offer in mediation and request status of co-counsel communications on these topics.	0.40	
	SAJ	B210	A109	Attend conference on cash collateral and 9019 Pozner settlement and conference with Battaglia.	1.00	
				For Current Services Rendered	15.70	9,420.00
				Total Non-billable Hours	0.40	

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
SHELBY A. JORDAN	Partners	15.70	\$600.00	\$9,420.00

06/30/2023	B110	E123	Research - Pacer	14.30
			Total Expenses	14.30
			Total Current Work	9,434.30
			Balance Due	<u>\$117,448.32</u>

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	660.00	14.30
B120	Asset Analysis and Recovery	180.00	0.00

JONES, ALEX

July 11, 2023

Account No: 5481-002000M
Statement No: 922517

Bankruptcy

		<u>Fees</u>	<u>Expenses</u>
B160	Fee/Employment Applications	660.00	0.00
B170	Fee/Employment Objections	600.00	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	6720.00	0.00
B100	Administration	8,820.00	14.30
B210	Business Operations	600.00	0.00
B200	Operations	600.00	0.00

The entry N/C signifies time spent for which there will be no charge.

EXHIBIT “B”**TASK CODES**

<u>CATEGORIES</u>	<u>ATTORNEY TIME</u>	<u>PARALEGAL TIME</u>
B110 Case Administration	5.5	
B120 Asset Analysis and Recovery	.60	
B130 Asset Disposition		
B140 Relief from Stay/Adequate Protection		
B150 Meetings of & Communications with Creditors		
B160 Fee/Employment Applications	1.1	3.70
B170 Fee/Employment Objections	1.0	
B180 Avoidance Action Analysis		
B185 Assumption/Rejection of Executory Contracts		
B190 Other Contested Matters	19.5	
B195 Non-Working Travel		
B210 Business Operations	1.0	
B220 Employee Benefits/Pensions		
B230 Financing/Cash Collections		
B240 Tax Issues		
B250 Real Estate		
B260 Board of Directors Matters		
B310 Claims Administration and Objections	2.0	
B320 Plan and Disclosure Statement		
B410 General Bankruptcy Advice/Opinions		
B420 Restructurings		
TOTALS:	30.7	3.70

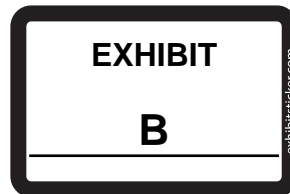
**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE)	
)	
ALEXANDER E. JONES)	CASE No. 22-33553
)	
DEBTOR.)	(CHAPTER 11)
)	
)	JUDGE CHRISTOPHER M. LOPEZ

CORRECTED

**SIXTH MONTHLY FEE STATEMENT OF JORDAN & ORTIZ, P.C. FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS
CO-COUNSEL TO THE DEBTOR FOR THE PERIOD FROM
JULY 1, 2023 THROUGH JULY 31, 2023**

Name of Applicant:	Jordan & Ortiz, P.C. (“J&O”)	
Applicant’s Role in Case:	Co-Counsel to Debtor	
Date Order of Appointment Signed:	January 20, 2023 (Dkt #105)	
	Beginning of Period	End of Period
Time Period Covered in Statement:	07/1/2023	07/31/2023
Summary of Total Fees and Expenses Requested		
Total Fees Requested in this Statement:		\$4,364.00 (80% of \$5,455.00)
Total Reimbursable Expenses Requested in this Statement:		\$203.39 ¹
Summary Attorney Fees for the Period Covered by this Statement		
Attorneys Fees in this Statement:		\$3,780.00
Total Actual Attorneys Hours Covered by this Statement:		6.30
Average Hourly Rate for Attorneys:		\$600.00
Summary Paraprofessional Fees for the Period Covered by this Statement		
Paraprofessional Fees Requested in this Statement:		\$1,675.00
Total Actual Paraprofessional Hours Covered by this Statement:		6.70
Average Hourly Rate for Paraprofessionals:		\$250.00



¹ The date listed for expenses contained in the attached does not necessarily reflect the date on which the expense was actually incurred by Applicant.

In accordance with the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106], each party receiving notice of the monthly fee statement will have 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14 day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

RELIEF REQUESTED

1. This is Jordan & Ortiz, P.C.'s ("J&O") sixth monthly fee statement for compensation (the "Fee Statement") for the period of July 1, 2023 through July 31, 2023 (the "Fee Period") pursuant to the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106] (the "Interim Compensation Order"). J&O is filing its sixth monthly fee statement for compensation showing that J&O requests: (a) allowance of compensation in the amount of \$4,364.00 (80% of \$5,455.00) for actual, reasonable, and necessary professional services rendered to the Debtor by J&O and (b) reimbursement of actual, reasonable, and necessary costs and expenses in the amount of \$0.00 incurred by J&O during the Fee Period. By this Fee Statement, J&O seeks interim allowance of compensation for services rendered and reimbursement of expenses incurred solely in connection with its work performed on behalf of the Debtor.

SERVICES RENDERED AND DISBURSEMENTS INCURRED

2. Attached above as Exhibit "A" is the Fee Statement for the period July 1, 2023 through July 31, 2023, which includes a summary of professionals who rendered services to the Debtor during the Fee Period, including each person's billing rate and the fees incurred during the Fee Period summarized by task code and the itemized schedule of expenses within each category, including description, incurred with the amounts for which reimbursement is requested. Exhibit

“A” also shows the fee statements that were included in the First Interim Application for fees and expenses from December 1, 2022 through May 15, 2023 (Docket #306) and Ordered to be paid (Docket #346). Attached as Exhibit “B” is a Task Code breakdown by Attorney and Paralegal.

NOTICE AND OBJECTION PROCEDURES

3. Pursuant to the Interim Compensation Order notice of this Fee Statement has been provided to:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, dallaseservice@crowedunlevy.com)
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. All parties that receive ECF notifications

In light of the nature of the relief requested herein, J&O submits that no further or other notice is required.

4. Pursuant to the Interim Compensation Order (ECF #106), the Notice Parties and parties in interest have 14 days after service of the Monthly Fee Statement to object to the requested

fees and expenses. If any Notice Party, or any other party in interest, objects to a Retained Professional's Monthly Fee Statement, it must serve on the affected Retained Professional and each of the other Notice Parties a written objection (the "Objection") so that it is received on or before the Objection Deadline. Thereafter, the objecting party and the affected Retained Professional may attempt to resolve the Objection on a consensual basis. If the parties are unable to reach a resolution of the Objection within 14 days after service of the Objection, or such later date as may be agreed upon by the objecting party and the affected Retained Professional, the affected Retained Professional may either: (i) file a response to the Objection with the Court, together with a request for payment of the difference, if any, between the Maximum Payment and the Authorized Payment made to the affected Retained Professional (the "Incremental Amount") and schedule such matter for hearing on at least 14 days' notice; or (ii) forego payment of the Incremental Amount until the next interim or final fee application hearing, at which time the Court will consider and dispose of the Objection if requested by the affected Retained Professional. Failure by a Notice Party, or any other party in interest, to object to a Monthly Fee Statement shall not constitute a waiver of any kind nor prejudice that party's right to object to any Interim Fee Application (as defined below) subsequently filed by a Retained Professional.

5. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. J&O reserves the right to make further application to this Court for allowance of such fees and expenses not included herein, or correct and erroneous or errors set out herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

WHEREFORE, pursuant to the Interim Compensation Order, and pending the expiration of the objection deadline, if no objections to the Fee Statement are received, J&O respectfully requests: (a) that it be allowed on an interim basis (i) \$4,364.00 (80% of fees in the amount of \$5,455.00) for reasonable, actual and necessary services rendered by it on behalf of the Debtor during the Fee Period and (ii) reimbursement of \$0.00 for reasonable, actual and necessary expenses incurred during the Fee Period; (b) that the Debtor be authorized and directed to immediately pay to J&O the amount of \$4,364.00 which is equal to the sum of 80% of J&O's fees and 100% of J&O's expenses incurred during the Fee Period, and (c) and granting such other and further relief as the Court may deem just and proper.

Dated: September 18, 2023

/s/ Shelby A. Jordan

SHELBY A. JORDAN

State Bar No. 11016700

S.D. No. 2195

ANTONIO ORTIZ

State Bar No. 24074839

S.D. No. 1127322

Jordan & Ortiz, P.C.

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Email: sjordan@jhwclaw.com

aortiz@jhwclaw.com

Copy to: cmadden@jhwclaw.com

CO-COUNSEL FOR DEBTOR

CERTIFICATE OF SERVICE

I certify that on September 18, 2023, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, dallaseservice@crowedunlevy.com)
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. All parties that receive ECF notifications

/s/ Shelby A. Jordan

Shelby A. Jordan

EXHIBIT “A”

JORDAN & ORTIZ, P.C. INVOICES FOR PERIOD December 1, 2022 through June 30, 2023

SUMMARY OF PREVIOUS INVOICES THAT HAVE BEEN ORDERED TO BE PAID UNDER DOCKET #346

<u>Invoice No.</u>	<u>Month Billed</u>	<u>Invoice Date</u>	<u>Fees</u>	<u>Expenses</u>	<u>Invoice Total</u>	<u>Amount Applied</u>	<u>Remaining Balance Due</u>
922199	December	1/27/23	\$77,362.50	\$506.65	\$77,869.15	-\$62,396.65	\$15,472.50
922213	January	2/15/23	\$28,125.00	\$102.50	\$28,227.50	-\$22,602.50	\$5,625.00
922268	February	3/2/23	\$51,205.00	\$22.44	\$51,227.44	-\$40,986.44	\$10,241.00
922376	March	4/6/23	\$46,820.00	\$120.30	\$46,940.30	-\$20,804.57	\$26,135.73
922405	April	5/4/23	\$15,560.00	\$0.00	\$15,560.00	\$0.00	\$15,560.00
922449	May 1-15	5/18/23	\$24,550.00	\$315.70	\$24,865.70	\$0.00	\$24,865.70
922462	May 16-31	6/8/23	\$9,925.00	\$189.09	\$10,114.09	\$0.00	\$10,114.09
922517	June	7/11/23	\$9,420.00	\$14.30	\$9,434.30	\$0.00	\$9,434.30
922607	July	8/3/23	\$5,455.00	\$0.00	\$5,455.00	\$0.00	\$5,455.00
TOTAL				\$1,270.98	\$269,693.48	-\$146,790.16	\$122,903.32

JORDAN & ORTIZ, P.C.
 500 N. SHORELINE BLVD, SUITE 804
 CORPUS CHRISTI, TEXAS 78401-0341
 TAX ID NO. 74-2553880
 (361) 884-5678

JONES, ALEX
 alexejones1777@gmail.com

Page: 1
 August 03, 2023
 Account No: 5481-002000M
 Statement No: 922607

Bankruptcy

PREVIOUS BALANCE					\$117,448.32
					Hours
07/07/2023	SAJ	B110	A104	Work on edits on employment agreement for client with FSS.	1.80
07/09/2023	SAJ	B110	A104	Pull prior employment agreement and review the employment agreement contract and compare issues.	0.40
07/10/2023	SAJ	B110	A103	Finish edits to employment agreement and forward to co-counsel with email and indemnity question.	0.40
07/13/2023	SAJ	B190	A104	Work on document production for client's efforts to acquire annuity under employment agreement and email to co-counsel regarding attorney client privileged communications.	0.60
07/14/2023	CRM	B190	A104	Email from Shelby Jordan to pull emails regarding annuity for possible production for Vickie Driver and begin pulling.	2.00
	SAJ	B190	A104	Begin to pull emails regarding annuities and emails to co-counsel regarding same.	1.00
07/17/2023	CRM	B190	A104	Continue to pull emails regarding annuity for possible production for Vickie Driver.	2.20
07/18/2023	CRM	B190	A104	Continue to pull emails regarding annuity for possible production for Vickie Driver and email same to Shelby Jordan.	1.00
	CRM	B160	A103	Prepare draft of fifth notice of monthly fee statements for May and June and email same to Shelby Jordan for revisions and approval to file.	1.00
07/19/2023	CRM	B160	A103	File and serve 5th monthly fee statement.	0.50
07/20/2023	SAJ	B190	A104	Work on document email production (AEJ regarding annuity efforts to purchase) to forward to co-counsel summary of background on annuity planning and transactions.	1.10
07/24/2023	SAJ	B190	A104	Finish internal review of email to pull all relevant to annuity issue and email to co-counsel that none extra are found.	0.70

JONES, ALEX

Page: 2

August 03, 2023

Account No: 5481-002000M
Statement No: 922607

Bankruptcy

Hours

07/25/2023	SAJ	B190	A107	Email to co-counsel regarding production of emails from J&O regarding annuity and pull ones marked by J&O as non-privileged.	0.30	
				For Current Services Rendered	13.00	5,455.00

Recapitulation

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
SHELBY A. JORDAN	Partners	6.30	\$600.00	\$3,780.00
CHRYSTAL MADDEN	Paralegals	6.70	250.00	1,675.00

07/31/2023		B110	E106	Pacer		
				Total Current Work		5,455.00

Balance Due	\$122,903.32
-------------	--------------

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	1560.00	0.00
B160	Fee/Employment Applications	375.00	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	3520.00	0.00
B100	Administration	5,455.00	0.00

The entry N/C signifies time spent for which there will be no charge.

EXHIBIT “B”**TASK CODES**

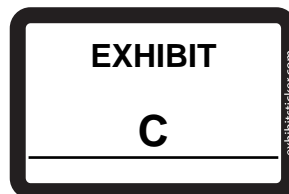
<u>CATEGORIES</u>	<u>ATTORNEY TIME</u>	<u>PARALEGAL TIME</u>
B110 Case Administration	2.6	
B120 Asset Analysis and Recovery		
B130 Asset Disposition		
B140 Relief from Stay/Adequate Protection		
B150 Meetings of & Communications with Creditors		
B160 Fee/Employment Applications		1.5
B170 Fee/Employment Objections		
B180 Avoidance Action Analysis		
B185 Assumption/Rejection of Executory Contracts		
B190 Other Contested Matters	3.7	5.2
B195 Non-Working Travel		
B210 Business Operations		
B220 Employee Benefits/Pensions		
B230 Financing/Cash Collections		
B240 Tax Issues		
B250 Real Estate		
B260 Board of Directors Matters		
B310 Claims Administration and Objections		
B320 Plan and Disclosure Statement		
B410 General Bankruptcy Advice/Opinions		
B420 Restructurings		
TOTALS:	6.3	6.7

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE)	
)	
ALEXANDER E. JONES)	CASE No. 22-33553
)	
DEBTOR.)	(CHAPTER 11)
)	
)	JUDGE CHRISTOPHER M. LOPEZ

**SEVENTH MONTHLY FEE STATEMENT OF JORDAN & ORTIZ, P.C. FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS
CO-COUNSEL TO THE DEBTOR FOR THE PERIOD FROM
AUGUST 1, 2023 THROUGH AUGUST 30, 2023**

Name of Applicant:	Jordan & Ortiz, P.C. (“J&O”)	
Applicant’s Role in Case:	Co-Counsel to Debtor	
Date Order of Appointment Signed:	January 20, 2023 (Dkt #105)	
	Beginning of Period	End of Period
Time Period Covered in Statement:	08/1/2023	08/30/2023
Summary of Total Fees and Expenses Requested		
Total Fees Requested in this Statement:		\$3,628.00 (80% of \$4,535.00)
Total Reimbursable Expenses Requested in this Statement:		32.50 ¹
Summary Attorney Fees for the Period Covered by this Statement		
Attorneys Fees in this Statement:		\$4,260.00
Total Actual Attorneys Hours Covered by this Statement:		7.10
Average Hourly Rate for Attorneys:		\$600.00
Summary Paraprofessional Fees for the Period Covered by this Statement		
Paraprofessional Fees Requested in this Statement:		\$275.00
Total Actual Paraprofessional Hours Covered by this Statement:		1.10
Average Hourly Rate for Paraprofessionals:		\$250.00



¹ The date listed for expenses contained in the attached does not necessarily reflect the date on which the expense was actually incurred by Applicant.

In accordance with the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106], each party receiving notice of the monthly fee statement will have 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14 day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

RELIEF REQUESTED

1. This is Jordan & Ortiz, P.C.'s ("J&O") seventh monthly fee statement for compensation (the "Fee Statement") for the period of August 1, 2023 through August 30, 2023 (the "Fee Period") pursuant to the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106] (the "Interim Compensation Order"). J&O is filing its seventh monthly fee statement for compensation showing that J&O requests: (a) allowance of compensation in the amount of \$3,628.00 (80% of \$4,535.00) for actual, reasonable, and necessary professional services rendered to the Debtor by J&O and (b) reimbursement of actual, reasonable, and necessary costs and expenses in the amount of \$32.50 incurred by J&O during the Fee Period. By this Fee Statement, J&O seeks interim allowance of compensation for services rendered and reimbursement of expenses incurred solely in connection with its work performed on behalf of the Debtor.

SERVICES RENDERED AND DISBURSEMENTS INCURRED

2. Attached above as Exhibit "A" is the Fee Statement for the period August 1, 2023 through August 30, 2023, which includes a summary of professionals who rendered services to the Debtor during the Fee Period, including each person's billing rate and the fees incurred during the Fee Period summarized by task code and the itemized schedule of expenses within each category,

including description, incurred with the amounts for which reimbursement is requested. Exhibit “A” also shows the fee statements that were included in the First Interim Application for fees and expenses from December 1, 2022 through May 15, 2023 (Docket #306) and Ordered to be paid (Docket #346). Attached as Exhibit “B” is a Task Code breakdown by Attorney and Paralegal.

NOTICE AND OBJECTION PROCEDURES

3. Pursuant to the Interim Compensation Order notice of this Fee Statement has been provided to:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, dallaseservice@crowedunlevy.com)
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. All parties that receive ECF notifications

In light of the nature of the relief requested herein, J&O submits that no further or other notice is required.

4. Pursuant to the Interim Compensation Order (ECF #106), the Notice Parties and parties in interest have 14 days after service of the Monthly Fee Statement to object to the requested fees and expenses. If any Notice Party, or any other party in interest, objects to a Retained Professional's Monthly Fee Statement, it must serve on the affected Retained Professional and each of the other Notice Parties a written objection (the "Objection") so that it is received on or before the Objection Deadline. Thereafter, the objecting party and the affected Retained Professional may attempt to resolve the Objection on a consensual basis. If the parties are unable to reach a resolution of the Objection within 14 days after service of the Objection, or such later date as may be agreed upon by the objecting party and the affected Retained Professional, the affected Retained Professional may either: (i) file a response to the Objection with the Court, together with a request for payment of the difference, if any, between the Maximum Payment and the Authorized Payment made to the affected Retained Professional (the "Incremental Amount") and schedule such matter for hearing on at least 14 days' notice; or (ii) forego payment of the Incremental Amount until the next interim or final fee application hearing, at which time the Court will consider and dispose of the Objection if requested by the affected Retained Professional. Failure by a Notice Party, or any other party in interest, to object to a Monthly Fee Statement shall not constitute a waiver of any kind nor prejudice that party's right to object to any Interim Fee Application (as defined below) subsequently filed by a Retained Professional.

5. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. J&O reserves the right to make further application to this Court for allowance of such fees and expenses not included herein, or correct and erroneous or errors set out herein. Subsequent Monthly Fee Statements will be filed

in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

WHEREFORE, pursuant to the Interim Compensation Order, and pending the expiration of the objection deadline, if no objections to the Fee Statement are received, J&O respectfully requests: (a) that it be allowed on an interim basis (i) \$3,628.00 (80% of fees in the amount of \$4,535.00) for reasonable, actual and necessary services rendered by it on behalf of the Debtor during the Fee Period and (ii) reimbursement of \$32.50 for reasonable, actual and necessary expenses incurred during the Fee Period; (b) that the Debtor be authorized and directed to immediately pay to J&O the amount of \$3,660.50 which is equal to the sum of 80% of J&O's fees and 100% of J&O's expenses incurred during the Fee Period, and (c) and granting such other and further relief as the Court may deem just and proper.

Dated: September 18, 2023

/s/ Shelby A. Jordan

SHELBY A. JORDAN

State Bar No. 11016700

S.D. No. 2195

ANTONIO ORTIZ

State Bar No. 24074839

S.D. No. 1127322

Jordan & Ortiz, P.C.

500 North Shoreline Blvd., Suite 804

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Telephone: (361) 884-5678

Facsimile: (361) 888-5555

Email: sjordan@jhwclaw.com

aortiz@jhwclaw.com

Copy to: cmadden@jhwclaw.com

CO-COUNSEL FOR DEBTOR

CERTIFICATE OF SERVICE

I certify that on September 18, 2023, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, dallaseservice@crowedunlevy.com)
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. All parties that receive ECF notifications

/s/ Shelby A. Jordan

Shelby A. Jordan

EXHIBIT “A”**JORDAN & ORTIZ, P.C. INVOICES FOR PERIOD
December 1, 2022 through July 31, 2023****SUMMARY OF PREVIOUS INVOICES THAT HAVE BEEN ORDERED
TO BE PAID UNDER DOCKET #346**

<u>Invoice No.</u>	<u>Month Billed</u>	<u>Invoice Date</u>	<u>Fees</u>	<u>Expenses</u>	<u>Invoice Total</u>	<u>Amount Applied</u>	<u>Remaining Balance Due</u>
922199	December	1/27/23	\$77,362.50	\$506.65	\$77,869.15	-\$62,396.65	\$15,472.50
922213	January	2/15/23	\$28,125.00	\$102.50	\$28,227.50	-\$22,602.50	\$5,625.00
922268	February	3/2/23	\$51,205.00	\$22.44	\$51,227.44	-\$40,986.44	\$10,241.00
922376	March	4/6/23	\$46,820.00	\$120.30	\$46,940.30	-\$20,804.57	\$26,135.73
922405	April	5/4/23	\$15,560.00	\$0.00	\$15,560.00	\$0.00	\$15,560.00
922449	May 1-15	5/18/23	\$24,550.00	\$315.70	\$24,865.70	\$0.00	\$24,865.70
922462	May 16-31	6/8/23	\$9,925.00	\$189.09	\$10,114.09	\$0.00	\$10,114.09
922517	June	7/11/23	\$9,420.00	\$14.30	\$9,434.30	\$0.00	\$9,434.30
922607	July	8/3/23	\$5,455.00	\$0.00	\$5,455.00	\$0.00	\$5,455.00
922637	August	9/7/23	\$4,535.00	\$32.50	\$4,567.50	\$0.00	\$4,567.50
TOTAL			\$272,957.50	\$1,303.48	274,260.98	-\$146,790.16	\$127,470.82

JORDAN R. ORTIZ
 500 N. SHORELINE BLVD, SUITE 804
 CORPUS CHRISTI, TEXAS 78401-0341
 TAX ID NO. 74-2553880
 (361) 884-5678

JONES, ALEX
 alexejones1777@gmail.com

Page: 1
 September 07, 2023
 Account No: 5481-002000M
 Statement No: 922637

Bankruptcy

PREVIOUS BALANCE						\$122,903.32
						Hours
08/01/2023	SAJ	B410	A106	Return call from client regarding operations, income, fees.		0.70
	SAJ	B410	A107	Email to Crissy Stephenson seeking time to be updated on status of case.		0.20
						n/c
08/07/2023	SAJ	B190	A106	Call from client regarding status hearing on MSJ and detailed discussion of Court's response and expected arguments by counsel.		1.10
08/08/2023	SAJ	B160	A103	Review new draft with Shelby Jordan edits to CRO application and effort to avoid veto of TDA and Harco on waiver of mediation privilege and call to Langston.		0.70
	SAJ	B310	A109	Listen to status conference on MSJ on non-dischargeability.		0.70
08/15/2023	CRM	B160	A103	Prepare 6th Monthly Fee Statement and file and serve same.		0.60
	SAJ	B190	A109	Attend hearing on oral arguments, MSJ and conference with client regarding hearing and expected outcome.		2.50
08/17/2023	CRM	B160	A103	Final revisions to 6th monthly fee statement notice and file and serve same.		0.50
08/18/2023	SAJ	B110	A106	Review and forward FSS MOR to client with comments.		0.30
08/29/2023	SAJ	B110	A106	Conference with client regarding latest order for DIP without new salary for Jones and email to co-counsel who clarifies.		0.40
	SAJ	B110	A107	Conference regarding Andino Reynal and hour rate and decision to retain for potential October trial and email to co-counsel.		0.30
08/31/2023	SAJ	B110	A106	Call from client regarding current status issues.		0.40
				For Current Services Rendered		8.20
				Total Non-billable Hours		0.20
						4,535.00

JONES, ALEX

September 07, 2023

Account No: 5481-002000M
Statement No: 922637

Bankruptcy

Recapitulation				
<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
SHELBY A. JORDAN	Partners	7.10	\$600.00	\$4,260.00
CHRYSTAL MADDEN	Paralegals	1.10	250.00	275.00

08/31/2023	B110	E106	Pacer	32.50
			Total Expenses	32.50
			Total Current Work	4,567.50
			Balance Due	<u>\$127,470.82</u>

<u>Task Code Summary</u>				
			<u>Fees</u>	<u>Expenses</u>
B110	Case Administration		840.00	32.50
B160	Fee/Employment Applications		695.00	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)		2160.00	0.00
B100	Administration		3,695.00	32.50
B310	Claims Administration and Objections		420.00	0.00
B300	Claims and Plan		420.00	0.00
B410	General Bankruptcy Advice/Opinions		420.00	0.00
B400	Bankruptcy-Related Advice		420.00	0.00

The entry N/C signifies time spent for which there will be no charge.

EXHIBIT “B”**TASK CODES**

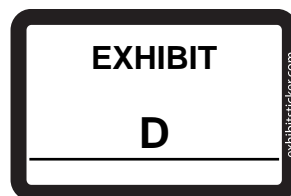
<u>CATEGORIES</u>	<u>ATTORNEY TIME</u>	<u>PARALEGAL TIME</u>
B110 Case Administration	1.4	
B120 Asset Analysis and Recovery		
B130 Asset Disposition		
B140 Relief from Stay/Adequate Protection		
B150 Meetings of & Communications with Creditors		
B160 Fee/Employment Applications	0.7	1.1
B170 Fee/Employment Objections		
B180 Avoidance Action Analysis		
B185 Assumption/Rejection of Executory Contracts		
B190 Other Contested Matters	3.6	
B195 Non-Working Travel		
B210 Business Operations		
B220 Employee Benefits/Pensions		
B230 Financing/Cash Collections		
B240 Tax Issues		
B250 Real Estate		
B260 Board of Directors Matters		
B310 Claims Administration and Objections	0.7	
B320 Plan and Disclosure Statement		
B410 General Bankruptcy Advice/Opinions	0.7	
B420 Restructurings		
TOTALS:	7.1	1.1

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE)	
)	
ALEXANDER E. JONES)	CASE No. 22-33553
)	
DEBTOR.)	(CHAPTER 11)
)	
)	JUDGE CHRISTOPHER M. LOPEZ

**EIGHTH MONTHLY FEE STATEMENT OF JORDAN & ORTIZ, P.C. FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS
CO-COUNSEL TO THE DEBTOR FOR THE PERIOD FROM
SEPTEMBER 1, 2023 THROUGH SEPTEMBER 30, 2023**

Name of Applicant:	Jordan & Ortiz, P.C. (“J&O”)	
Applicant’s Role in Case:	Co-Counsel to Debtor	
Date Order of Appointment Signed:	January 20, 2023 (Dkt #105)	
	Beginning of Period	End of Period
Time Period Covered in Statement:	09/1/2023	09/30/2023
Summary of Total Fees and Expenses Requested		
Total Fees Requested in this Statement:	\$12,688.00 (80% of \$15,860.00)	
Total Reimbursable Expenses Requested in this Statement:	\$16.10 ¹	
Summary Attorney Fees for the Period Covered by this Statement		
Attorneys Fees in this Statement:	\$15,660.00	
Total Actual Attorneys Hours Covered by this Statement:	26.10	
Average Hourly Rate for Attorneys:	\$600.00	
Summary Paraprofessional Fees for the Period Covered by this Statement		
Paraprofessional Fees Requested in this Statement:	\$200.00	
Total Actual Paraprofessional Hours Covered by this Statement:	0.80	
Average Hourly Rate for Paraprofessionals:	\$250.00	



¹ The date listed for expenses contained in the attached does not necessarily reflect the date on which the expense was actually incurred by Applicant.

In accordance with the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106], each party receiving notice of the monthly fee statement will have 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14 day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

RELIEF REQUESTED

1. This is Jordan & Ortiz, P.C.'s ("J&O") eighth monthly fee statement for compensation (the "Fee Statement") for the period of September 1, 2023 through September 30, 2023 (the "Fee Period") pursuant to the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106] (the "Interim Compensation Order"). J&O is filing its eighth monthly fee statement for compensation showing that J&O requests: (a) allowance of compensation in the amount of \$12,688.00 (80% of \$15,860.00) for actual, reasonable, and necessary professional services rendered to the Debtor by J&O and (b) reimbursement of actual, reasonable, and necessary costs and expenses in the amount of \$16.10 incurred by J&O during the Fee Period. By this Fee Statement, J&O seeks interim allowance of compensation for services rendered and reimbursement of expenses incurred solely in connection with its work performed on behalf of the Debtor.

SERVICES RENDERED AND DISBURSEMENTS INCURRED

2. Attached as Exhibit "A" is the Fee Statement for the period September 1, 2023 through September 30, 2023, which includes a summary of professionals who rendered services to the Debtor during the Fee Period, including each person's billing rate and the fees incurred during the Fee Period summarized by task code and the itemized schedule of expenses within each

category, including description, incurred with the amounts for which reimbursement is requested. Exhibit “A” also shows the fee statements that were included in the First Interim Application for fees and expenses from December 1, 2022 through May 15, 2023 (Docket #306) and Ordered to be paid (Docket #346). Attached as Exhibit “B” is a Task Code breakdown by Attorney and Paralegal.

NOTICE AND OBJECTION PROCEDURES

3. Pursuant to the Interim Compensation Order notice of this Fee Statement has been provided to:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, dallaseservice@crowedunlevy.com)
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. All parties that receive ECF notifications

In light of the nature of the relief requested herein, J&O submits that no further or other notice is required.

4. Pursuant to the Interim Compensation Order (ECF #106), the Notice Parties and parties in interest have 14 days after service of the Monthly Fee Statement to object to the requested fees and expenses. If any Notice Party, or any other party in interest, objects to a Retained Professional's Monthly Fee Statement, it must serve on the affected Retained Professional and each of the other Notice Parties a written objection (the "Objection") so that it is received on or before the Objection Deadline. Thereafter, the objecting party and the affected Retained Professional may attempt to resolve the Objection on a consensual basis. If the parties are unable to reach a resolution of the Objection within 14 days after service of the Objection, or such later date as may be agreed upon by the objecting party and the affected Retained Professional, the affected Retained Professional may either: (i) file a response to the Objection with the Court, together with a request for payment of the difference, if any, between the Maximum Payment and the Authorized Payment made to the affected Retained Professional (the "Incremental Amount") and schedule such matter for hearing on at least 14 days' notice; or (ii) forego payment of the Incremental Amount until the next interim or final fee application hearing, at which time the Court will consider and dispose of the Objection if requested by the affected Retained Professional. Failure by a Notice Party, or any other party in interest, to object to a Monthly Fee Statement shall not constitute a waiver of any kind nor prejudice that party's right to object to any Interim Fee Application (as defined below) subsequently filed by a Retained Professional.

5. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. J&O reserves the right to make further application to this Court for allowance of such fees and expenses not included herein, or correct and erroneous or errors set out herein. Subsequent Monthly Fee Statements will be filed

in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

WHEREFORE, pursuant to the Interim Compensation Order, and pending the expiration of the objection deadline, if no objections to the Fee Statement are received, J&O respectfully requests: (a) that it be allowed on an interim basis (i) \$12,688.00 (80% of fees in the amount of \$15,860.00) for reasonable, actual and necessary services rendered by it on behalf of the Debtor during the Fee Period and (ii) reimbursement of \$16.10 for reasonable, actual and necessary expenses incurred during the Fee Period; (b) that the Debtor be authorized and directed to immediately pay to J&O the amount of \$12,704.10 which is equal to the sum of 80% of J&O's fees and 100% of J&O's expenses incurred during the Fee Period, and (c) and granting such other and further relief as the Court may deem just and proper.

Dated: October 10, 2023

/s/ Shelby A. Jordan
SHELBY A. JORDAN
State Bar No. 11016700
S.D. No. 2195
ANTONIO ORTIZ
State Bar No. 24074839
S.D. No. 1127322
Jordan & Ortiz, P.C.
500 North Shoreline Blvd., Suite 804
Corpus Christi, TX 78401
Telephone: (361) 884-5678
Facsimile: (361) 888-5555
Email: sjordan@jhwclaw.com
aortiz@jhwclaw.com
Copy to: cmadden@jhwclaw.com
CO-COUNSEL FOR DEBTOR

CERTIFICATE OF SERVICE

I certify that on October 10, 2023, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, dallaseservice@crowedunlevy.com)
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. All parties that receive ECF notifications

/s/ Shelby A. Jordan

Shelby A. Jordan

EXHIBIT “A”

**JORDAN & ORTIZ, P.C. INVOICES FOR PERIOD
SEPTEMBER 1, 2023 through SEPTEMBER 30, 2023**

**SUMMARY OF PREVIOUS INVOICES THAT HAVE BEEN ORDERED
TO BE PAID UNDER DOCKET #346²**

<u>Invoice No.</u>	<u>Month Billed</u>	<u>Invoice Date</u>	<u>Fees</u>	<u>Expenses</u>	<u>Invoice Total</u>	<u>Amount Applied</u>	<u>Remaining Balance Due</u>
922199	December	1/27/23	\$77,362.50	\$506.65	\$77,869.15	-\$62,396.65	\$15,472.50
922213	January	2/15/23	\$28,125.00	\$102.50	\$28,227.50	-\$22,602.50	\$5,625.00
922268	February	3/2/23	\$51,205.00	\$22.44	\$51,227.44	-\$40,986.44	\$10,241.00
922376	March	4/6/23	\$46,820.00	\$120.30	\$46,940.30	-\$20,804.57	\$26,135.73
922405	April	5/4/23	\$15,560.00	\$0.00	\$15,560.00	\$0.00	\$15,560.00
922449	May 1-15	5/18/23	\$24,550.00	\$315.70	\$24,865.70	\$0.00	\$24,865.70
TOTAL			\$272,957.50	\$1,303.48	274,260.98	-\$146,790.16	\$127,470.82

² Order Granting First Interim Application of Jordan & Ortiz, P.C. for Allowance and Payment of Compensation and Reimbursement of Expenses Incurred for the Period from December 2, 2022 through May 15, 2023

JONES, ALEX & ORTIZ, S.B.
 500 N. SHORELINE BLVD, SUITE 804
 CORPUS CHRISTI, TEXAS 78401-0341
 TAX ID NO. 74-2553880
 (361) 884-5678

JONES, ALEX
 alexejones1777@gmail.com

Page: 1
 October 04, 2023
 Account No: 5481-002000M
 Statement No: 922703

Bankruptcy

PREVIOUS BALANCE					\$127,470.82	
					Hours	
09/06/2023	SAJ	B190	A107	Email to co-counsel regarding 2004 Examination of Alex Jones on the 12th (next Tuesday) and attendance and call from client.	0.30	180.00
	SAJ	B190	A107	Email to co-counsel regarding lack of objection to dischargeability regarding the original State Court suit alleging actual fraudulent transfers involving client and David Jones.	0.50	300.00
09/08/2023	SAJ	B410	A103	Pull prior form of motion and briefing on issues to report to court (including some original 2022 issues) and work on updating for co-counsel.	1.80	1,080.00
09/10/2023	SAJ	B110	A102	Pull research on indemnity, expense reimbursement, client salary and double reductions and client contributions of \$10M in assets in 2023 and clients \$1M administrative claims.	1.40	840.00
09/11/2023	SAJ	B110	A103	Work on locating final motion to recover trial expenses and disclosing cost sharing responses to Court's inquiry regarding 25% of trial costs.	1.10	660.00
	SAJ	B110	A107	Trip to client office and meeting with co-counsel and work on issues for 2004 exam and for pleading disclosing issues requested by the court since and finish search and additions to 2004 exam issues and expense motion 2022.	2.60	1,560.00
09/12/2023	SAJ	B190	A109	Attend (remotely) 2004 examination of client and work and send real-time information to co-counsel in response to questions and answers.	3.20	1,920.00
	SAJ	B190	A106	Call to co-counsel and client regarding 2004 exam.	0.20	120.00
09/13/2023	SAJ	B190	A109	Attend part of 2004 exam and pull ESG issues from internet and call to client after examination.	1.80	1,080.00
	SAJ	B190	A103	Work on edits to co-counsel response to ROR filing by Committee and support citations to record for arguments.	2.60	1,560.00

JONES, ALEX

October 04, 2023

Account No: 5481-002000M
Statement No: 922703

Bankruptcy

					Hours	
09/14/2023	SAJ	B190	A103	Work on version 2 and 3 of response to ROR and circulate to co-counsel and conference with client.	2.00	1,200.00
09/15/2023	CRM	B160	A103	Prepare 7th monthly fee statement and email to Shelby Jordan for approval.	0.60	150.00
	SAJ	B110	A104	Review co-counsel editing of ROR response and additional edits sent to co-counsel for approval and filing.	2.60	1,560.00
	SAJ	B320	A106	Conference with client regarding ROR memo, edits and information included in reply.	0.40	240.00
09/18/2023	CRM	B160	A103	File Corrected 6th Monthly Fee Statement and 7th Monthly Fee Statement.	0.20	50.00
09/19/2023	SAJ	B110	A104	Review MOR of both FSS and client and email to co-counsel regarding \$2.5 M retained in FSS with client unable to pay administrative expenses.	0.30	180.00
	SAJ	B120	A106	Conference with client regarding Joey Delano 2004 exam and status.	0.20	120.00
09/20/2023	SAJ	B210	A104	Review MOR from FSS and AEJ regarding salary issues and inability to fund Ch 11 expenses by FSS retention of all its needed funds.	0.40	240.00
09/22/2023	SAJ	B110	A107	Email to co-counsel regarding salary issues and additional articles on draws from FSS by client misquoted by Sandy Hook counsel first day.	0.40	240.00
09/25/2023	SAJ	B110	A107	Call to Battaglia regarding hearing on cash collateral and funds available from FSS to client.	0.20	120.00
09/26/2023	SAJ	B210	A109	Listen to hearing on cash collateral and related agreements to transfer funds to client regarding administrative claims for advances and for past and current salary (1.4 but only bill .5).	0.50	300.00
09/28/2023	SAJ	B190	A104	Review 2004 exam notice of scheduling and call to Steve Lemmon and David Jones counsel and email to co-counsel regarding availability of remote attendance.	0.60	360.00
	SAJ	B190	A106	Call to client regarding David Jones 2004 exam and email to co-counsel regarding David Jones exam.	0.50	300.00
09/29/2023	SAJ	B110	A107	Telephone conference with Battaglia regarding DIP bank account closure and issue of mediation ending and confirmation to be set and Court's ruling on MSJ of Plaintiffs.	0.70	420.00
	SAJ	B110	A107	Call to Norm Pattis and conference call with client on related potential reasons government wants bank access by client removed.	0.60	360.00

JONES, ALEX

October 04, 2023

Account No: 5481-002000M

Statement No: 922703

Bankruptcy

09/30/2023	SAJ	B110	A106	Telephone conference with client memo and call to client regarding Battaglia, Pattis regarding banking issues and potential subpoena and update on status of FSS.	Hours	
					1.20	720.00
				For Current Services Rendered	26.90	15,860.00

Recapitulation						
Timekeeper	Title	Hours	Rate	Total		
SHELBY A. JORDAN	Partners	26.10	\$600.00	\$15,660.00		
CHRYSTAL MADDEN	Paralegals	0.80	250.00	200.00		

09/30/2023	B110	E106	Computer Research - Pacer	16.10
			Total Expenses	16.10
			Total Current Work	15,876.10
			Total Payments	-30,727.29
			Balance Due	<u>\$112,619.63</u>

Task Code Summary

		Fees	Expenses
B110	Case Administration	6660.00	16.10
B120	Asset Analysis and Recovery	120.00	0.00
B160	Fee/Employment Applications	200.00	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	7020.00	0.00
B100	Administration	14,000.00	16.10
B210	Business Operations	540.00	0.00
B200	Operations	540.00	0.00
B320	Plan and Discosure Statement (including Business Plan)	240.00	0.00
B300	Claims and Plan	240.00	0.00
B410	General Bankruptcy Advice/Opinions	1080.00	0.00
B400	Bankruptcy-Related Advice	1,080.00	0.00

Your trust account #1 balance is

09/19/2023	Opening Balance	\$0.00
	Interim Wire Payment	8,974.35

JONES, ALEX

October 04, 2023

Account No: 5481-002000M
Statement No: 922703

Bankruptcy

09/21/2023	Payment on 922199	-8,974.35
09/28/2023	Interim Wire Payment	21,752.94
10/03/2023	Payment on 922199, 922213 and 922268	-21,752.94
	Closing Balance	\$0.00

The entry N/C signifies time spent for which there will be no charge.

EXHIBIT “B”**TASK CODES**

<u>CATEGORIES</u>	<u>ATTORNEY TIME</u>	<u>PARALEGAL TIME</u>
B110 Case Administration	11.10	
B120 Asset Analysis and Recovery	0.20	
B130 Asset Disposition		
B140 Relief from Stay/Adequate Protection		
B150 Meetings of & Communications with Creditors		
B160 Fee/Employment Applications		0.80
B170 Fee/Employment Objections		
B180 Avoidance Action Analysis		
B185 Assumption/Rejection of Executory Contracts		
B190 Other Contested Matters	11.70	
B195 Non-Working Travel		
B210 Business Operations	0.90	
B220 Employee Benefits/Pensions		
B230 Financing/Cash Collections		
B240 Tax Issues		
B250 Real Estate		
B260 Board of Directors Matters		
B310 Claims Administration and Objections		
B320 Plan and Disclosure Statement	0.40	
B410 General Bankruptcy Advice/Opinions	1.80	
B420 Restructurings		
TOTALS:	26.10	.80

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE)	
)	
ALEXANDER E. JONES)	CASE No. 22-33553
)	
DEBTOR.)	(CHAPTER 11)
)	
)	JUDGE CHRISTOPHER M. LOPEZ

**NINTH MONTHLY FEE STATEMENT OF JORDAN & ORTIZ, P.C. FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS
CO-COUNSEL TO THE DEBTOR FOR THE PERIOD FROM
OCTOBER 1, 2023 THROUGH OCTOBER 31, 2023**

Name of Applicant:	Jordan & Ortiz, P.C. (“J&O”)	
Applicant’s Role in Case:	Co-Counsel to Debtor	
Date Order of Appointment Signed:	January 20, 2023 (Dkt #105)	
	Beginning of Period	End of Period
Time Period Covered in Statement:	10/1/2023	10/31/2023
Summary of Total Fees and Expenses Requested		
Total Fees Requested in this Statement:		\$7,916.00 (80% of \$9,895.00)
Total Reimbursable Expenses Requested in this Statement:		\$0.00 ¹
Summary Attorney Fees for the Period Covered by this Statement		
Attorneys Fees in this Statement:		\$9,420.00
Total Actual Attorneys Hours Covered by this Statement:		15.70
Average Hourly Rate for Attorneys:		\$600.00
Summary Paraprofessional Fees for the Period Covered by this Statement		
Paraprofessional Fees Requested in this Statement:		\$475.00
Total Actual Paraprofessional Hours Covered by this Statement:		1.90
Average Hourly Rate for Paraprofessionals:		\$250.00



¹ The date listed for expenses contained in the attached does not necessarily reflect the date on which the expense was actually incurred by Applicant.

In accordance with the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106], each party receiving notice of the monthly fee statement will have 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14 day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

RELIEF REQUESTED

1. This is Jordan & Ortiz, P.C.'s ("J&O") ninth monthly fee statement for compensation (the "Fee Statement") for the period of October 1, 2023 through October 31, 2023 (the "Fee Period") pursuant to the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106] (the "Interim Compensation Order"). J&O is filing its ninth monthly fee statement for compensation showing that J&O requests: (a) allowance of compensation in the amount of \$7,916.00 (80% of \$9,895.00) for actual, reasonable, and necessary professional services rendered to the Debtor by J&O and (b) reimbursement of actual, reasonable, and necessary costs and expenses in the amount of \$0.00 incurred by J&O during the Fee Period. By this Fee Statement, J&O seeks interim allowance of compensation for services rendered and reimbursement of expenses incurred solely in connection with its work performed on behalf of the Debtor.

SERVICES RENDERED AND DISBURSEMENTS INCURRED

2. Attached as Exhibit "A" is the Fee Statement for the period October 1, 2023 through October 31, 2023, which includes a summary of professionals who rendered services to the Debtor during the Fee Period, including each person's billing rate and the fees incurred during the Fee Period summarized by task code and the itemized schedule of expenses within each category,

including description, incurred with the amounts for which reimbursement is requested. Exhibit “A” also shows the fee statements that were included in the First Interim Application for fees and expenses from December 1, 2022 through May 15, 2023 (Docket #306) and Ordered to be paid (Docket #346). Attached as Exhibit “B” is a Task Code breakdown by Attorney and Paralegal.

NOTICE AND OBJECTION PROCEDURES

3. Pursuant to the Interim Compensation Order notice of this Fee Statement has been provided to:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, dallaseservice@crowedunlevy.com)
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. All parties that receive ECF notifications

In light of the nature of the relief requested herein, J&O submits that no further or other notice is required.

4. Pursuant to the Interim Compensation Order (ECF #106), the Notice Parties and parties in interest have 14 days after service of the Monthly Fee Statement to object to the requested fees and expenses. If any Notice Party, or any other party in interest, objects to a Retained Professional's Monthly Fee Statement, it must serve on the affected Retained Professional and each of the other Notice Parties a written objection (the "Objection") so that it is received on or before the Objection Deadline. Thereafter, the objecting party and the affected Retained Professional may attempt to resolve the Objection on a consensual basis. If the parties are unable to reach a resolution of the Objection within 14 days after service of the Objection, or such later date as may be agreed upon by the objecting party and the affected Retained Professional, the affected Retained Professional may either: (i) file a response to the Objection with the Court, together with a request for payment of the difference, if any, between the Maximum Payment and the Authorized Payment made to the affected Retained Professional (the "Incremental Amount") and schedule such matter for hearing on at least 14 days' notice; or (ii) forego payment of the Incremental Amount until the next interim or final fee application hearing, at which time the Court will consider and dispose of the Objection if requested by the affected Retained Professional. Failure by a Notice Party, or any other party in interest, to object to a Monthly Fee Statement shall not constitute a waiver of any kind nor prejudice that party's right to object to any Interim Fee Application (as defined below) subsequently filed by a Retained Professional.

5. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. J&O reserves the right to make further application to this Court for allowance of such fees and expenses not included herein, or correct and erroneous or errors set out herein. Subsequent Monthly Fee Statements will be filed

in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

WHEREFORE, pursuant to the Interim Compensation Order, and pending the expiration of the objection deadline, if no objections to the Fee Statement are received, J&O respectfully requests: (a) that it be allowed on an interim basis (i) \$7,916.00 (80% of fees in the amount of \$9,895.00) for reasonable, actual and necessary services rendered by it on behalf of the Debtor during the Fee Period and (ii) reimbursement of \$0.00 for reasonable, actual and necessary expenses incurred during the Fee Period; (b) that the Debtor be authorized and directed to immediately pay to J&O the amount of \$7,916.00 which is equal to the sum of 80% of J&O's fees and 100% of J&O's expenses incurred during the Fee Period, and (c) and granting such other and further relief as the Court may deem just and proper.

Dated: November 9, 2023

/s/ Shelby A. Jordan

SHELBY A. JORDAN

State Bar No. 11016700

S.D. No. 2195

ANTONIO ORTIZ

State Bar No. 24074839

S.D. No. 1127322

Jordan & Ortiz, P.C.

500 North Shoreline Blvd., Suite 804

Corpus Christi, TX 78401

Telephone: (361) 884-5678

Facsimile: (361) 888-5555

Email: sjordan@jhwclaw.com

aortiz@jhwclaw.com

Copy to: cmadden@jhwclaw.com

CO-COUNSEL FOR DEBTOR

CERTIFICATE OF SERVICE

I certify that on November 9, 2023, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, dallaseservice@crowedunlevy.com)
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. All parties that receive ECF notifications

/s/ Shelby A. Jordan

Shelby A. Jordan

EXHIBIT “A”

**JORDAN & ORTIZ, P.C. INVOICES FOR PERIOD
OCTOBER 1, 2023 through OCTOBER 31, 2023**

**SUMMARY OF PREVIOUS INVOICES THAT HAVE BEEN ORDERED
TO BE PAID UNDER DOCKET #346²**

<u>Invoice No.</u>	<u>Month Billed</u>	<u>Invoice Date</u>	<u>Fees</u>	<u>Expenses</u>	<u>Invoice Total</u>	<u>Amount Applied</u>	<u>Remaining Balance Due</u>
922199	December	1/27/23	\$77,362.50	\$506.65	\$77,869.15	-\$62,396.65	\$15,472.50
922213	January	2/15/23	\$28,125.00	\$102.50	\$28,227.50	-\$22,602.50	\$5,625.00
922268	February	3/2/23	\$51,205.00	\$22.44	\$51,227.44	-\$40,986.44	\$10,241.00
922376	March	4/6/23	\$46,820.00	\$120.30	\$46,940.30	-\$20,804.57	\$26,135.73
922405	April	5/4/23	\$15,560.00	\$0.00	\$15,560.00	\$0.00	\$15,560.00
922449	May 1-15	5/18/23	\$24,550.00	\$315.70	\$24,865.70	\$0.00	\$24,865.70
TOTAL			\$272,957.50	\$1,303.48	274,260.98	-\$146,790.16	\$127,470.82

² Order Granting First Interim Application of Jordan & Ortiz, P.C. for Allowance and Payment of Compensation and Reimbursement of Expenses Incurred for the Period from December 2, 2022 through May 15, 2023

EXHIBIT “B”**TASK CODES**

<u>CATEGORIES</u>	<u>ATTORNEY TIME</u>	<u>PARALEGAL TIME</u>
B110 Case Administration	11.50	
B120 Asset Analysis and Recovery		
B130 Asset Disposition		
B140 Relief from Stay/Adequate Protection		
B150 Meetings of & Communications with Creditors		
B160 Fee/Employment Applications		1.90
B170 Fee/Employment Objections		
B180 Avoidance Action Analysis		
B185 Assumption/Rejection of Executory Contracts		
B190 Other Contested Matters	3.60	
B195 Non-Working Travel		
B210 Business Operations		
B220 Employee Benefits/Pensions		
B230 Financing/Cash Collections		
B240 Tax Issues		
B250 Real Estate		
B260 Board of Directors Matters		
B310 Claims Administration and Objections	0.60	
B320 Plan and Disclosure Statement		
B410 General Bankruptcy Advice/Opinions		
B420 Restructurings		
TOTALS:	15.80	1.90

DR DANIEL ORTIZ, ESQ.
 500 N. SHORELINE BLVD, SUITE 804
 CORPUS CHRISTI, TEXAS 78401-0341
 TAX ID NO. 74-2553880
 (361) 884-5678

JONES, ALEX
 alexejones1777@gmail.com

Page: 1
 November 06, 2023
 Account No: 5481-002000M
 Statement No: 922768

Bankruptcy

PREVIOUS BALANCE						\$112,619.63
					Hours	
10/02/2023	SAJ	B110	A106	Email to client and Lemmon and co-counsel.	0.40	240.00
	SAJ	B110	A106	Conference with client and conference call with co-counsel and client regarding issues with FFC CRO and status of funding, book arrangement, salary and other matters.	1.20	720.00
	SAJ	B190	A109	Attend 2004 exam of David Jones (actual time spend 4.0).	1.50	900.00
10/03/2023	SAJ	B110	A106	Three calls with client regarding discussions yesterday with client, Shelby Jordan and co-counsel and timing of bringing issues to Court's attention if CRO continues to refuse to deal with income and salary issues and email to co-counsel.	0.70	420.00
10/04/2023	SAJ	B110	A106	Call from client and review regarding Ch V and issue raised regarding McGill opposition to repayment of administrative claim and email to co-counsel.	0.40	240.00
10/05/2023	SAJ	B110	A106	Call from client regarding Chapter V and issue raised regarding McGill opposition to repayment of administrative claim and client request to call Battaglia.	0.60	360.00
10/06/2023	SAJ	B110	A106	Conference with client regarding funds holdup by FSS and issue of consent to hold up by SubV Trustee.	0.40	240.00
	SAJ	B110	A107	Call to Battaglia and message.	0.20	120.00
10/07/2023	SAJ	B110	A106	Conference with client regarding refusal of McGill to approve salary or administrative expenses.	0.40	240.00
	SAJ	B110	A107	Conference with Pattis and email to co-counsel to object to demand estate incur expense to travel to Georgia for testimony and retention of Pattis by estate to deal with Georgia vs Trump.	0.50	300.00
10/09/2023	CRM	B160	A103	Prepare 8th Monthly Fee Statement and email to Shelby Jordan for approval.	0.50	125.00

JONES, ALEX

November 06, 2023

Account No: 5481-002000M

Statement No: 922768

Bankruptcy

					Hours	
	CRM	B160	A103	Start draft of 2nd Interim Fee Statement.	1.10	275.00
	SAJ	B110	A106	Call to client to verify not contacting McGill directly subpoena from GA State Court.	0.30	180.00
10/10/2023	CRM	B160	A103	File 8th Monthly Fee Statement and serve same.	0.30	75.00
	SAJ	B110	A107	Conference with Pattis regarding Georgia subpoenas and objection by client and call to client regarding same.	0.60	360.00
10/12/2023	SAJ	B110	A107	Conference with Ray Battaglia regarding issues with McGill and plan confirmation without agreements between Texas and Connecticut Plaintiffs.	0.30	180.00
	SAJ	B110	A106	Email and call from client on meeting in Houston without invitation to attend.	0.20	120.00
10/16/2023	SAJ	B110	A107	Review email from co-counsel regarding budget of fees and reply.	0.40	240.00
10/19/2023	SAJ	B110	A107	Conference with co-counsel and email regarding budgeting.	0.20	120.00
	SAJ	B110	A106	Conference with client regarding MSJ rulings TX and Conn and set up meeting tomorrow.	0.50	300.00
	SAJ	B110	A107	Conference wit co-counsel regarding rulings.	0.20	120.00
	SAJ	B110	A107	Conference with Norm Pattis regarding Georgia subpoena and representation locally of Alex Jones and MSJ ruling in Conn case.	1.00	600.00
	SAJ	B310	A104	Read both MSJ rulings by Court and outline issues and questions to co-counsel handling briefing and arguments.	0.60	360.00
10/20/2023	SAJ	B190	A106	Meeting in office with client regarding Court's MSJ orders.	1.30	780.00
	SAJ	B190	A107	Call to co-counsel and telephone conference with co-counsel and MSJ team to discuss orders and going forward strategy.	0.80	480.00
10/23/2023	SAJ	B110	A106	Call and conference with client regarding issue of non-payment of salary and MSJ and continued decision to work.	0.80	480.00
10/24/2023	SAJ	B110	A106	Conference with client and conference with co-counsel regarding ongoing refusal to adjust salary and ongoing refusal to fund administrative expense.	1.10	660.00
10/26/2023	SAJ	B110	A106	Telephone conference with client regarding strategy regarding MSJ, Lopez docket, current issues with Sub Ch V lawyer and potential resignation and update on turmoil in SDTX system.	0.50	300.00
10/27/2023	SAJ	B110	A106	Follow up call with client regarding strategy in face of SDTX docket and judge issues and appeal.	0.60	360.00

JONES, ALEX

November 06, 2023

Account No: 5481-002000M
Statement No: 922768

Bankruptcy

	Hours	
For Current Services Rendered	17.60	9,895.00

Timekeeper	Recapitulation	Title	Hours	Rate	Total
SHELBY A. JORDAN		Partners	15.70	\$600.00	\$9,420.00
CHRYSTAL MADDEN		Paralegals	1.90	250.00	475.00

Total Current Work	9,895.00
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Balance Due	<u>\$122,514.63</u>
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Task Code Summary

		Fees	Expenses
B110	Case Administration	6900.00	0.00
B160	Fee/Employment Applications	475.00	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	2160.00	0.00
B100	Administration	9,535.00	0.00
B310	Claims Administration and Objections	360.00	0.00
B300	Claims and Plan	360.00	0.00

The entry N/C signifies time spent for which there will be no charge.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE)	
)	
ALEXANDER E. JONES)	CASE No. 22-33553
)	
DEBTOR.)	(CHAPTER 11)
)	
)	JUDGE CHRISTOPHER M. LOPEZ

**TENTH MONTHLY FEE STATEMENT OF JORDAN & ORTIZ, P.C. FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS
CO-COUNSEL TO THE DEBTOR FOR THE PERIOD FROM
NOVEMBER 1, 2023 THROUGH NOVEMBER 30, 2023**

Name of Applicant:	Jordan & Ortiz, P.C. (“J&O”)	
Applicant’s Role in Case:	Co-Counsel to Debtor	
Date Order of Appointment Signed:	January 20, 2023 (Dkt #105)	
	Beginning of Period	End of Period
Time Period Covered in Statement:	11/01/2023	11/30/2023
Summary of Total Fees and Expenses Requested		
Total Fees Requested in this Statement:		\$5,092.00 (80% of \$6,365.00)
Total Reimbursable Expenses Requested in this Statement:		\$65.00 ¹
Summary Attorney Fees for the Period Covered by this Statement		
Attorneys Fees in this Statement:		\$6,240.00
Total Actual Attorneys Hours Covered by this Statement:		10.40
Average Hourly Rate for Attorneys:		\$600.00
Summary Paraprofessional Fees for the Period Covered by this Statement		
Paraprofessional Fees Requested in this Statement:		\$125.00
Total Actual Paraprofessional Hours Covered by this Statement:		0.50
Average Hourly Rate for Paraprofessionals:		\$250.00



¹ The date listed for expenses contained in the attached does not necessarily reflect the date on which the expense was actually incurred by Applicant.

In accordance with the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106], each party receiving notice of the monthly fee statement will have 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14 day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

RELIEF REQUESTED

1. This is Jordan & Ortiz, P.C.'s ("J&O") ninth monthly fee statement for compensation (the "Fee Statement") for the period of November 1, 2023 through November 30, 2023 (the "Fee Period") pursuant to the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106] (the "Interim Compensation Order"). J&O is filing its ninth monthly fee statement for compensation showing that J&O requests: (a) allowance of compensation in the amount of \$5,092.00 (80% of \$6,365.00) for actual, reasonable, and necessary professional services rendered to the Debtor by J&O and (b) reimbursement of actual, reasonable, and necessary costs and expenses in the amount of \$65.00 incurred by J&O during the Fee Period. By this Fee Statement, J&O seeks interim allowance of compensation for services rendered and reimbursement of expenses incurred solely in connection with its work performed on behalf of the Debtor.

SERVICES RENDERED AND DISBURSEMENTS INCURRED

2. Attached as Exhibit "A" is the Fee Statement for the period November 1, 2023 through November 30, 2023, which includes a summary of professionals who rendered services to the Debtor during the Fee Period, including each person's billing rate and the fees incurred during the Fee Period summarized by task code and the itemized schedule of expenses within each

category, including description, incurred with the amounts for which reimbursement is requested. Exhibit “A” also shows the fee statements that were included in the First Interim Application for fees and expenses from December 1, 2022 through May 15, 2023 (Docket #306) and Ordered to be paid (Docket #346). Attached as Exhibit “B” is a Task Code breakdown by Attorney and Paralegal.

NOTICE AND OBJECTION PROCEDURES

3. Pursuant to the Interim Compensation Order notice of this Fee Statement has been provided to:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, dallaseservice@crowedunlevy.com)
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. All parties that receive ECF notifications

In light of the nature of the relief requested herein, J&O submits that no further or other notice is required.

4. Pursuant to the Interim Compensation Order (ECF #106), the Notice Parties and parties in interest have 14 days after service of the Monthly Fee Statement to object to the requested fees and expenses. If any Notice Party, or any other party in interest, objects to a Retained Professional's Monthly Fee Statement, it must serve on the affected Retained Professional and each of the other Notice Parties a written objection (the "Objection") so that it is received on or before the Objection Deadline. Thereafter, the objecting party and the affected Retained Professional may attempt to resolve the Objection on a consensual basis. If the parties are unable to reach a resolution of the Objection within 14 days after service of the Objection, or such later date as may be agreed upon by the objecting party and the affected Retained Professional, the affected Retained Professional may either: (i) file a response to the Objection with the Court, together with a request for payment of the difference, if any, between the Maximum Payment and the Authorized Payment made to the affected Retained Professional (the "Incremental Amount") and schedule such matter for hearing on at least 14 days' notice; or (ii) forego payment of the Incremental Amount until the next interim or final fee application hearing, at which time the Court will consider and dispose of the Objection if requested by the affected Retained Professional. Failure by a Notice Party, or any other party in interest, to object to a Monthly Fee Statement shall not constitute a waiver of any kind nor prejudice that party's right to object to any Interim Fee Application (as defined below) subsequently filed by a Retained Professional.

5. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. J&O reserves the right to make further application to this Court for allowance of such fees and expenses not included herein, or correct and erroneous or errors set out herein. Subsequent Monthly Fee Statements will be filed

in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

WHEREFORE, pursuant to the Interim Compensation Order, and pending the expiration of the objection deadline, if no objections to the Fee Statement are received, J&O respectfully requests: (a) that it be allowed on an interim basis (i) \$5,092.00 (80% of fees in the amount of \$6,365.00) for reasonable, actual and necessary services rendered by it on behalf of the Debtor during the Fee Period and (ii) reimbursement of \$65.00 for reasonable, actual and necessary expenses incurred during the Fee Period; (b) that the Debtor be authorized and directed to immediately pay to J&O the amount of \$5,157.000 which is equal to the sum of 80% of J&O's fees and 100% of J&O's expenses incurred during the Fee Period, and (c) and granting such other and further relief as the Court may deem just and proper.

Dated: December 12, 2023

/s/ Shelby A. Jordan

SHELBY A. JORDAN

State Bar No. 11016700

S.D. No. 2195

ANTONIO ORTIZ

State Bar No. 24074839

S.D. No. 1127322

Jordan & Ortiz, P.C.

500 North Shoreline Blvd., Suite 804

Corpus Christi, TX 78401

Telephone: (361) 884-5678

Facsimile: (361) 888-5555

Email: sjordan@jhwclaw.com

aortiz@jhwclaw.com

Copy to: cmadden@jhwclaw.com

CO-COUNSEL FOR DEBTOR

CERTIFICATE OF SERVICE

I certify that on December 12, 2023, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, dallaseservice@crowedunlevy.com)
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. All parties that receive ECF notifications

/s/ Shelby A. Jordan

Shelby A. Jordan

EXHIBIT “A”

**JORDAN & ORTIZ, P.C. INVOICES FOR PERIOD
NOVEMBER 1, 2023 THROUGH NOVEMBER 30, 2023**

500 N. SHORELINE BLVD, SUITE 804
 CORPUS CHRISTI, TEXAS 78401-0341
 TAX ID NO. 74-2553880
 (361) 884-5678

JONES, ALEX
 alexejones1777@gmail.com

Page: 1
 December 06, 2023
 Account No: 5481-002000M
 Statement No: 922835

Bankruptcy

PREVIOUS BALANCE					\$122,514.63	
					Hours	
11/02/2023	SAJ	B110	A107	Conference with co-counsel regarding new developments in plan, negotiations, status of pending claims in Texas and client position.	0.30	180.00
	SAJ	B110	A106	Conference with client.	0.40	240.00
11/05/2023	SAJ	B110	A106	Call from client regarding status of appeals and potential for settlements.	0.30	180.00
11/09/2023	CRM	B160	A103	Prepare 9th Monthly Fee Notice and file and serve same.	0.50	125.00
11/10/2023	SAJ	B110	A104	Review budget from co-counsel and work on budget and forward.	0.60	360.00
	SAJ	B210	A104	Review brief and edit for Texas appeal and copy to Chris Martin.	1.00	600.00
11/12/2023	SAJ	B110	A106	Call to client regarding statement in broadcast about resolutions.	0.20	120.00
11/13/2023	SAJ	B190	A104	Review proposal by Debtors for settlement and calls to co-counsel and call from and to Battaglia.	1.70	1,020.00
11/14/2023	SAJ	B190	A103	Work on additional edits to the proposed settlement outline.	0.70	420.00
11/15/2023	SAJ	B130	A106	Review and telephone conference with client regarding sale of exempt assets on-line.	0.30	180.00
11/16/2023	SAJ	B110	A103	Pull and prepare initial accounting to disclose any funds paid for bankruptcy advise and petition preparation in the SOFA.	0.80	480.00
	SAJ	B110	A107	Review and forward to co-counsel Jay Wolman's email regarding client's claim against Erica Garbatini bankruptcy.	0.40	240.00
	SAJ	B410	A106	Call from client regarding sale of his exempt property and reminder of Governor Conoly's Chapter 7 sale of his		

JONES, ALEX

December 06, 2023

Account No: 5481-002000M

Statement No: 922835

Bankruptcy

				non-exempt property.	Hours 0.40	240.00
11/21/2023	SAJ	B110	A107	Emails to co-counsel regarding status of settlement and NY trip and call to client regarding same.	0.40	240.00
11/22/2023	SAJ	B110	A107	Email and call to co-counsel regarding 2004 exam of Bob R and status of NY trip and settlement and review motion for status conference and issues raised by Motion and MOR filed.	0.50	300.00
	SAJ	B110	A104	Review exhibit list for client question on EGS hearing on rejection of contacts (whiskey, EGS Agr).	0.30	180.00
	SAJ	B320	A104	Begin analysis on bean transactions and claim by GrainChain to disclaim profits and emails and call to Dundon Advisors.	0.20	120.00
11/27/2023	SAJ	B110	A107	Email to co-counsel on issues of hearing and \$650k salary for client and status of NY Settlement trip.	0.20	120.00
	SAJ	B110	A107	Call to Battaglia regarding hearing outcome, Judge response to motions and status of NY Settlement negotiations.	0.50	300.00
	SAJ	B110	A104	Review memo of status of offers exchanged to settle matters and telephone conference with co-counsel.	0.20	120.00
	SAJ	B320	A104	Review motion for creditor plan.	0.30	180.00
11/29/2023	SAJ	B110	A107	Call from Battaglia regarding funds sent by Axios from prior Chapter 11 of Health to address in Victoria and conference with Chrystal Madden to get report of location of check and call to ex CRO account name for direction.	0.70	420.00
				For Current Services Rendered	10.90	6,365.00

Timekeeper		Recapitulation		Hours	Rate	Total
SHELBY A. JORDAN		Title				
		Partners		10.40	\$600.00	\$6,240.00
CHRYSTAL MADDEN		Paralegals		0.50	250.00	125.00

11/30/2023	B110	E106	Pacer			65.00
			Total Expenses			65.00
			Total Current Work			6,430.00
			Total Payments			-28,915.38
			Balance Due			<u>\$100,029.25</u>

JONES, ALEX

December 06, 2023

Account No: 5481-002000M
Statement No: 922835

Bankruptcy

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	3480.00	65.00
B130	Asset Disposition	180.00	0.00
B160	Fee/Employment Applications	125.00	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	1440.00	0.00
B100	Administration	5,225.00	65.00
B210	Business Operations	600.00	0.00
B200	Operations	600.00	0.00
B320	Plan and Disclosure Statement (including Business Plan)	300.00	0.00
B300	Claims and Plan	300.00	0.00
B410	General Bankruptcy Advice/Opinions	240.00	0.00
B400	Bankruptcy-Related Advice	240.00	0.00

Your trust account #1 balance is

	Opening Balance	\$0.00
11/16/2023	Interim Wire Payment	28,915.38
11/16/2023	Payment on 922268, 922376 and 922405	-28,915.38
	Closing Balance	\$0.00

The entry N/C signifies time spent for which there will be no charge.

**SUMMARY OF PREVIOUS INVOICES THAT HAVE BEEN ORDERED
TO BE PAID UNDER DOCKET #346²**

<u>Invoice No.</u>	<u>Month Billed</u>	<u>Invoice Date</u>	<u>Fees</u>	<u>Expenses</u>	<u>Invoice Total</u>	<u>Amount Applied</u>	<u>Interim Amount Applied Per #346</u>	<u>Remaining Balance Due</u>
First Fee Application								
922199	December	1/27/23	\$77,362.50	\$506.65	\$77,869.15	-\$62,396.65	\$15,472.50	\$0.00
922213	January	2/15/23	\$28,125.00	\$102.50	\$28,227.50	-\$22,602.50	\$5,625.00	\$0.00
922268	February	3/2/23	\$51,205.00	\$22.44	\$51,227.44	-\$40,986.44	\$10,241.00	\$0.00
922376	March	4/6/23	\$46,820.00	\$120.30	\$46,940.30	-\$20,804.57	\$26,135.73	\$0.00
922405	April	5/4/23	\$15,560.00	\$0.00	\$15,560.00	\$0.00	\$2,168.44	\$13,391.56
922449	May 1-15	5/18/23	\$24,550.00	\$315.70	\$24,865.70	\$0.00		\$24,865.70
		TOTALS	\$243,622.50	\$1,067.59	\$244,690.09	-\$146,790.16	\$59,642.67	\$38,257.26

² Order Granting First Interim Application of Jordan & Ortiz, P.C. for Allowance and Payment of Compensation and Reimbursement of Expenses Incurred for the Period from December 2, 2022 through May 15, 2023

EXHIBIT “B”**TASK CODES**

<u>CATEGORIES</u>	<u>ATTORNEY TIME</u>	<u>PARALEGAL TIME</u>
B110 Case Administration	5.80	
B120 Asset Analysis and Recovery		
B130 Asset Disposition	0.30	
B140 Relief from Stay/Adequate Protection		
B150 Meetings of & Communications with Creditors		
B160 Fee/Employment Applications		0.50
B170 Fee/Employment Objections		
B180 Avoidance Action Analysis		
B185 Assumption/Rejection of Executory Contracts		
B190 Other Contested Matters	2.40	
B195 Non-Working Travel		
B210 Business Operations		
B220 Employee Benefits/Pensions		
B230 Financing/Cash Collections		
B240 Tax Issues		
B250 Real Estate		
B260 Board of Directors Matters		
B310 Claims Administration and Objections		
B320 Plan and Disclosure Statement	0.50	
B410 General Bankruptcy Advice/Opinions	0.40	
B420 Restructurings		
TOTALS:	10.40	0.50